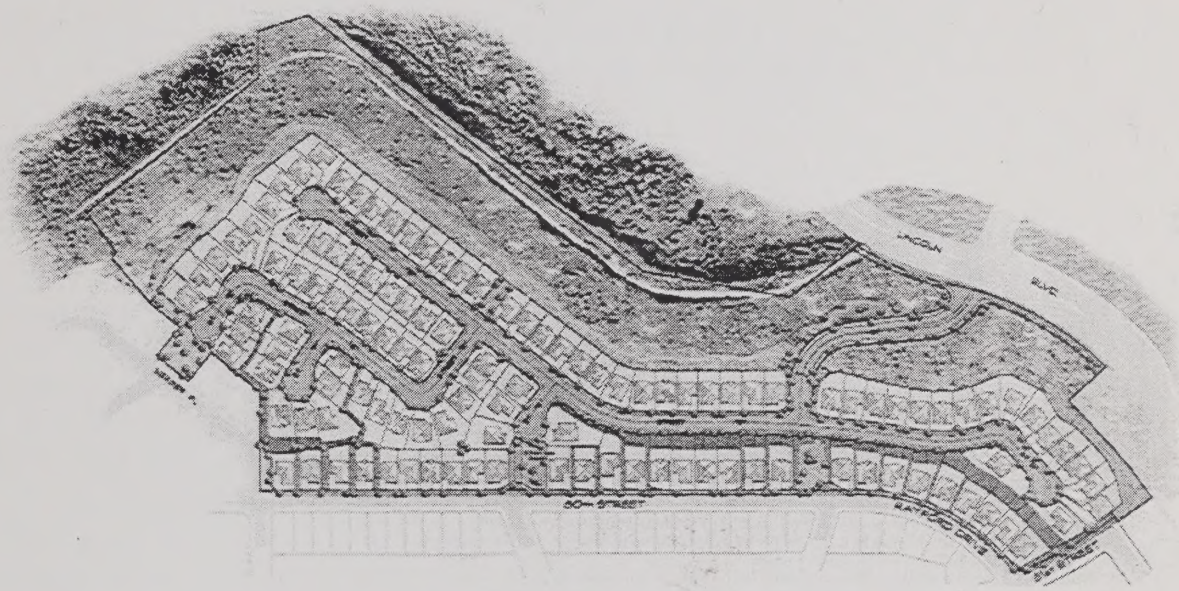
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West Bluffs Project Subsequent Final Environmental Impact Report



EIR No. 91-0675

State Clearinghouse No. 92041046

October 1998

City of Los Angeles

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FINAL ENVIRONMENTAL IMPACT REPORT

This document comprises the second and final part of the Environmental Impact Report (EIR) for this project. The West Bluffs Subsequent Draft EIR, previously circulated for public review and comment, comprises the first part, and is available for review at the Department of City Planning, Environmental Review Section, 221 North Figueroa Street, Room 1500, Los Angeles, CA 90012.

Westchester/Playa Del Rey District Plan
Sixth Council District

EIR No. 91-0675-SUB (CDP)
STATE CLEARINGHOUSE No. 92041046

West Bluffs

PROJECT: This project replaces an earlier proposal for a 121 single-family home subdivision proposed in 1994 on the Westchester/Playa Del Rey Bluffs. The Final EIR was approved by the City of Los Angeles, after which design revisions were anticipated, but never formally submitted. Consequently, the EIR was never certified. The current Applicant is now proposing to implement the project with revisions which respond both to community concerns regarding the appearance and preservation of the bluff and to City of Los Angeles Engineering requirements relative to bluff stability. Further, the project has been modified to respond to public comments regarding project traffic impacts on neighborhood residential streets. The revised project includes subdividing the 44-acre site into 119 single family residential lots, 12 open space lots, and associated streets. The open space would be distributed in hillside and bluff face areas, a small view park, and a pedestrian trail/open space system including a small view park. Amended grading and bluff restoration programs are proposed which preserve and revegetate the majority of the existing bluff face, set homes further back from the bluff edge, and stabilize slopes.

REQUESTED ACTIONS: Discretionary approvals may include, but would not be limited to the following: Tentative Tract Map approval - City of Los Angeles; Coastal Development Permit - City of Los Angeles and California Coastal Commission; Zoning Administrator Interpretation for front yard setback modification on various lots - City of Los Angeles; Resource Agency Permits - U.S. Army Corps of Engineers, California Department of Fish and Game, and the California Regional Water Quality Control Board; Grading Permit - City of Los Angeles; Disposal Site/Haul Route Permit - City of Los Angeles; Caltrans Encroachment Permit - Caltrans; "B" Permit for Water, Sewer, Storm Drain, Street and Encroachment Permits - City of Los Angeles; Building Permits - City of Los Angeles; Lot Line Adjustment/Merger of Lots - City of Los Angeles; Minor Area Variance - City of Los Angeles; and Hastings Avenue Vacation/Merger - City of Los Angeles.

APPLICANT:

Catellus Residential Group
5 Park Plaza, Suite 400
Irvine, California 92714

EIR No. 91-0675-SUB(CDP) SCH No. 92041046

Project Name West Bluffs Project Subsequent Final Environmental Impact Report

RECOMMENDATION FOR EIR CERTIFICATION

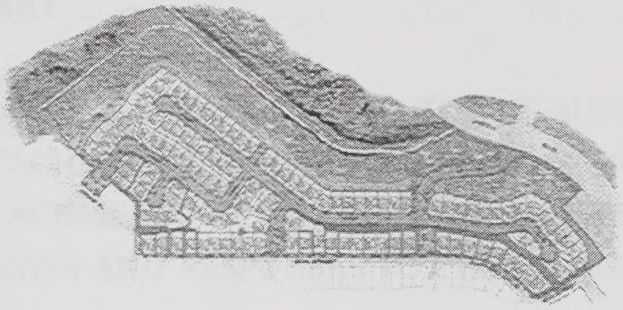
Pursuant to California Code of Regulations, Title 14, Section 15090, this EIR has been completed in compliance with the California Environmental Quality Act and current State and City Guidelines and based on information may be accepted and considered prior to making a final decision on the project. The decision-making body must certify that it has reviewed and considered the information contained in the Environmental Impact Report prior to making such decision.

Submitted by:

Lateef Sholebo
Project Coordinator, City Planning Associate
City Planning Department

Hadar Plafkin
Supervising City Planner
City Planning Department

West Bluffs Project Subsequent Final Environmental Impact Report



Lead Agency:

The City of Los Angeles

Department of Planning
Environmental Review Section
221 North Figueroa Street, Room 1500
Los Angeles, California 90012

Project Applicant:

Catellus Residential Group

Submitted by:

Planning Consultants Research

October 1998

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I. Summary

I. SUMMARY

A. PROJECT LOCATION

The project site is located in the Westchester/Playa del Rey community at the western edge of the City of Los Angeles approximately 1.25 miles from the Pacific Ocean. The site is adjacent to Lincoln Boulevard (State Route 1) on the east, and faces an existing single-family residential community on the south which includes the 7300 block of 81st Street, the 8000 block of Rayford Drive, and the 7400 and 7500 blocks of 80th Street. The northern boundary of the site is approximately demarcated by Cabora Drive, a service road along the face of the Westchester/ Playa del Rey Bluffs. The bluffs, also known as the Ballona Escarpment, overlook the Ballona Wetlands.

B. SUMMARY OF PROPOSED PROJECT

An earlier design for a 121 single-family home subdivision was proposed in 1994 on the approximate 44-acre site. The Final EIR was approved by the City of Los Angeles, and design revisions were then anticipated by the Applicant, but never formally submitted. Consequently, the EIR was never certified. Catellus Residential Group (the Applicant) is now proposing to implement the project with revisions which respond both to community concerns regarding the appearance and preservation of the bluff and to City of Los Angeles Engineering requirements relative to bluff stability. Further, the project has been modified to respond to public review comments regarding project traffic impacts on neighborhood residential streets.

The revised project includes subdividing the 44-acre site into 119 single family residential lots, streets and 12 open space lots. The project is anticipated to accommodate roughly 317 residents. Residential development would occupy approximately 21 acres, or 47 percent of the project site, with an average lot size of 8,000 square feet (sq.ft.). Streets would occupy approximately six acres, or 14 percent of the project site.

The remaining portion of the project site, 17 acres (39 percent), would consist of open space. The current proposed open space would be distributed as follows: (1) the eastern edge of the site which would include a sloping hillside area and a small viewpark (a passive recreation area with benches and walkways overlooking the wetlands) along "A" Street and Lincoln Boulevard; (2) on the bluff face and an area at the top of the bluff overlooking the Ballona

Wetlands below, from Lincoln Boulevard to the west end of the site; and (3) along a pedestrian trail system (Lot 122), which begins at the terminus of "D" Street along the bluff top and extends to "A" Street. The pedestrian trail system also includes several pedestrian linkages to the surrounding neighborhood, including Lots 127, 128, and 130, each which provide a minimum 100-foot wide area of open space. Proposed open space Lot 120 would provide access to the bluff top trail at the westerly end of the project site. Proposed open space Lot 130 would replace two existing lots that are currently zoned residential. In addition, open space Lot 129 has been added along 81st Street to act as a proposed landscape buffer between the existing homes on 81st Street and Colegio Drive and the project.

Under the revised project, amended grading and bluff restoration programs are proposed. Preservation of the majority of the existing bluff face is proposed as part of the development. Some erosional gullies along the bluff face would be repaired to satisfy City concerns for geotechnical safety and the larger erosional feature (commonly referred to as Hastings Canyon) would be filled with conventional grading techniques and finished slopes. The revised grading and stabilization plans include setting the home sites further away from the current edge of the bluffs to comply with geotechnical safety concerns.

In order to implement the proposed project, discretionary approvals may include, but not be limited to the following:

- Tentative Tract Map approval - City of Los Angeles
- Coastal Development Permit - City of Los Angeles and California Coastal Commission
- Zoning Administrator Interpretation for front yard setback modification on various lots - City of Los Angeles
- Resource Agency Permits - U.S. Army Corps of Engineers; California Department of Fish and Game; and the California Regional Water Quality Control Board
- Grading Permit - City of Los Angeles
- Disposal Site/Haul Route Permit - City of Los Angeles
- Caltrans Encroachment Permit - Caltrans
- "B" Permit for Water, Sewer, Storm Drain, Street and Encroachment Permits -City of Los Angeles

- Building Permits - City of Los Angeles
- Lot Line Adjustment/Merger of Lots - City of Los Angeles
- Minor Area Variance - City of Los Angeles
- Hastings Avenue Vacation/Merger

C. PROJECT BACKGROUND

This Subsequent EIR has been prepared to address the revised project with regard to potential modifications in environmental impact. The preparation of a Subsequent EIR is permitted by CEQA in response to changed circumstances and new information without requiring that the environmental review process begin completely anew. Therefore, this document is based on the evaluation of the current project proposal and the previous environmental documentation.

Based on the initial study, the following issues are analyzed in this Subsequent EIR:

- Earth (Grading and Seismicity)
- Air Quality (Mobile: construction related and operational)
- Water (Surface Water Runoff/Hydrology)
- Plant and Animal Life
- Noise (Mobile: construction-related and operational)
- Land Use
- Population and Housing
- Transportation and Circulation (Traffic and Access)
- Public Services
- Energy Conservation
- Utilities
- Aesthetics and Views

- Cultural Resources (Archaeological and Paleontological)

A Notice of Preparation (NOP) for this Subsequent EIR was distributed for a 30-day period from October 31, 1997 to December 1, 1997. Responsible agencies and interested parties were invited to submit comments regarding the potential impacts of the revised project. Several public meetings were held at which neighbors of the project and other interested parties were invited to comment on the relevant environmental issues which should be discussed in the Subsequent EIR. The issues raised were consistent with issues raised previously and focused on traffic, density-related impacts, and aesthetics and views.

This Subsequent EIR addresses each of the issues identified by the previous EIR, as well as those concerns disclosed through circulation comments and public comment. The previous EIR is on file with the Department of City Planning, Environmental Review Section, 221 N. Figueroa Street, Room 1500, Los Angeles. NOP comment letters and responses to those comments are included in Appendix B of this Subsequent EIR.

D. AREA(S) OF CONTROVERSY

As with the previous project, the main areas of controversy generated by the revised project include traffic circulation patterns and increased traffic volumes, aesthetics/views, intensity of development, and alterations to the Westchester/Playa del Rey Bluffs.

E. ALTERNATIVES

The CEQA Guidelines require that a reasonable range of alternatives to the proposed project be described and evaluated, which could feasibly attain the basic objectives of the project. Six alternatives to the proposed project have been evaluated for environmental impacts in Section VI including: Alternative 1 - No-Project Alternative, Alternative 2 - Alternative Access (No Access from Lincoln Boulevard), Alternative 3 - Reduced Site Elevation, Alternative 4 - Reduced Density Alternative, Alternative 5 - Alternative Slope Stabilization Plan, Alternative 6 - Alternative Use (Community Park), and Alternative 7 - Alternative Site. A brief description of each alternative follows along with a determination of the Environmentally Superior Alternative as required by CEQA.

1. Alternative 1 - No-Project Alternative

The No-Project Alternative would keep the project site in its current state. The site would remain undeveloped, and would be occasionally disked for weed and fire control. The erosional ditches on the face of the bluffs would remain and would continue to erode from drainage over the northern edge of the project site. The undeveloped site would still be available for development in the future. Under this proposal, the portion of Tract No. 9167 within the project site (23 lots) would remain available for future use and could be subject to single-family development along the face of the bluff.

2. Alternative 2 - Alternative Access (No Access from Lincoln Boulevard)

This alternative would eliminate the proposed entry from a new road ("A" Street), which would connect with Lincoln Boulevard at Hughes Terrace. Under this alternative, traffic would enter the project site via 80th Street, Rayford Drive and Berger Avenue, through the existing neighborhood adjacent to the project site. The internal street network for the project would be slightly redesigned, but would follow the same basic layout. Grading would still occur within similar limits as the proposed project (i.e., the bluff top and bluff face adjacent to Lincoln Boulevard). This is due to the proposed improvements to stormwater drainage and sewage flow (equivalent to improvements planned as part of the proposed project). Due to the elimination of the earthwork cut for "A" Street, this would also eliminate the need to export material off-site. The open space features, repair of the large erosional feature (Hastings Canyon), and other bluff restoration and stabilization activities would be similar to the proposed project.

3. Alternative 3 - Reduced Site Elevation

This alternative would follow the same basic layout and design as the proposed project, and would include approximately 120 residential units. However, implementation of this alternative would lower the average elevation of the site by approximately 20 feet in order to reduce impacts to views from along 80th Street and Berger Avenue. Under this alternative, no homes would have direct access to the existing residential neighborhood (80th Street and Rayford Drive). The internal project road system would be slightly altered but comparable to that of the proposed project. Access to Lincoln Boulevard would be the same as under the proposed project. This alternative assumes that the drainage systems, open space features, and the fill of Hastings Canyon would also be the same as with the proposed project.

4. Alternative 4 - Reduced Density Alternative

This alternative was developed to address the effects of increasing the minimum lot size of the project, thus reducing the overall density of the project site. Under this alternative, the project would be reduced in size by approximately 20 percent from 120 residential units to 96 units, and the average lot size would increase from 7,770 sq.ft. to approximately 9,700 sq.ft. Therefore, this alternative is expected to accommodate approximately 257 residents. This alternative analysis assumes that the road system and access, the drainage systems, open space features, the fill of Hastings Canyon, and the bluff restoration and stabilization would be the same as with the proposed project. In addition, it is assumed that construction activities would be similar to the proposed project for this alternative.

5. Alternative 5 - Alternative Slope Stabilization Plan

This alternative would follow the same basic layout and design as the proposed project, and would include approximately 120 residential units. However, implementation of this alternative would include cut of the natural slope of the bluff face to provide greater surficial slope stability. Under the alternative, grading of the bluff face would be completed to produce an overall 2:1 gradient and include approximately five-foot wide drainage benches. Once grading was completed, the bluff face would be revegetated with native plant material. This alternative analysis assumes that the road system and access, the drainage systems, open space features, and the fill of Hastings Canyon would be the same as with the proposed project.

6. Alternative 6 - Alternative Use (Community Park)

Implementation of this alternative would include developing the approximately 44-acre site as a community park. Development of a community park would utilize the project site for various active and passive uses. These could include amenities such as baseball diamonds, combined football and soccer fields, tennis and handball courts, a swimming pool and additional activities. However, this alternative was not evaluated in detail as there have been no proposals to purchase the site from the Applicant for the purpose of developing a park. Therefore, implementation of this alternative is remote and speculative, and further analysis is not required.

7. Alternative 7 - Alternative Site

The selection of an alternative site is intended to identify another site for the proposed project, which would offer substantial environmental advantages over the location of the selected site. Alternative sites were investigated and no feasible sites were found that would meet the

project objectives, as the project is located in an almost completely developed area. Of the four potential sites identified in the previous EIR, three are no longer available, due to development or current construction. The fourth, Playa-Vista, would not result in significant environmental improvements over the proposed project site. Other appropriate sites are not readily available in the project area, as it is already largely developed. Consideration was made of the potential location of the project at outlying sites where large lot single-family development is appropriate. However, such property is not owned by the Applicant and these sites would not meet project objectives. Therefore, implementation of the proposed project on an alternative site would not be feasible.

8. Alternatives Comparison and Selection of Environmentally Superior Alternative

Alternatives were compared to evaluate their relative merit and identify an environmentally superior alternative. The CEQA Guidelines require identification of such an alternative which would reduce and/or eliminate significant adverse impacts associated with a project. The selection of an environmentally superior alternative was based on an across-the-board comparison of the environmental impacts of each environmental category for each alternative. The No Project Alternative is considered the overall environmentally superior alternative, because it would reduce significant impacts associated with the proposed project to a level of insignificance. However, the No-Project Alternative would not meet any of the Applicant's project objectives and would preclude the realization of several beneficial impacts (with regard to restoration of the bluff face, drainage control and traffic conditions).

In accordance with CEQA, if the environmentally superior alternative is the No Project Alternative, another alternative must be identified as the environmentally superior alternative. Therefore, the Reduced Density Alternative is the environmentally superior alternative.

F. SUMMARY OF ENVIRONMENTAL IMPACTS

IV. A. 1. GRADING

Environmental Impact

Grading impacts were analyzed in terms of existing geologic conditions and slope stability. Development of the proposed project would require the excavation of approximately 461,000 cubic yards of earth, of which approximately 211,000 cubic yards would be re-used to fill other portions of the project site and approximately 250,000 cubic yards would be exported from the

project site[1]. With the exception of Hastings Canyon, which would be filled with a 2:1 slope and grading to stabilize several small erosional features on the bluff face, project grading design would retain the majority of the bluff slope in its natural condition. Residential lots and houses would be setback beyond what would be the 2:1 slope projection to further ensure the stability of the homes. All grading activities would be conducted in accordance with all applicable provisions of the City of Los Angeles Building Code and Zoning Code as well as seismic design criteria contained within the Uniform Building Code. Impacts would be less than significant.

Mitigation Measures

Project implementation would result in less than significant impacts with regard to grading, and therefore, no mitigation measures are required to reduce project significance. However, the following mitigation and code compliance measures are recommended to ensure minimal grading impacts that may occur as part of development of the proposed project:

1. All grading shall be accomplished under the observation and testing of the project geotechnical engineer and engineering geologist in accordance with the current Grading Ordinance of the City of Los Angeles.

2. Prior to grading, the areas proposed for development shall be stripped and cleared of all existing vegetation, debris, and other deleterious materials. These materials shall be disposed of off-site.

3. During site clearing, earthwork and grading shall be protected from flooding, ponding or inundation from poor or improper surface drainage. Temporary provisions shall be made at all times to adequately direct surface drainage from all sources on and off the work site.

4. Following excavation of the overburden materials, the exposed grade shall then be scarified to a depth of six inches, moistened to optimum content, and placed at a minimum selective compaction of 92 percent as determined in accordance with ASTM Test Method: D-1557-91.

5. Fill, consisting of soil approved by the soils engineer, shall be placed horizontally in compacted layers with suitable compaction equipment. The inert debris, such

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[1] *Amount of excavation and export may actually be less, based upon the revised October 1998 site plan.*

as concrete, shall be utilized in the deeper portions of compacted fills and a minimum of 15 feet from the face of the westerly facing slope. Fill shall be observed by the soils engineer prior to use in fill areas. Rocks larger than four inches shall not be used in the fill.

6. The fill shall be compacted to at least 92 percent of the maximum laboratory density for the material used. The maximum density shall be determined by ASTM Test Method: D-1557-91 or equivalent.

7. Field observation and testing shall be performed by the soils engineer during grading to assist the contractor in obtaining the required degree of compaction and the proper moisture content. Where compaction is less than required, additional compactive effort shall be made with adjustment of the moisture content, as necessary, until 92 percent compaction is obtained.

8. All areas to be developed within the project shall have a minimum of three feet of approved compacted fill below the projected finished grade.

9. Fill slopes shall not generally exceed a 2:1 gradient. Compacted fill shall be keyed and benched into terrace of Pleistocene sediments. Keyways shall be a minimum of 12 feet wide and three feet into sound material as measured on the downhill side. Subdrains shall be required on the base of all fills in the axis of drainage courses.

10. Cut slopes shall not exceed a 2:1 gradient.

11. The grading plan shall be reviewed by the Departments of Building and Safety, and Public Works for adherence to City Guidelines.

12. The design of foundations, retaining walls, floor slabs, decking and paving shall be in conformance with recommendations of the engineering consultants study performed by Pacific Soils Engineering, Inc. (included as Appendix C).

13. In accordance with the provisions of the Coastal Bluffs Specific Plan, there shall be no grading, import or export, or movement on a site of more than 10 cubic yards of dirt, without approval of a soils and geology report. This report shall include:

- A run-off and drainage control plan, a slope protection plan and an erosion protection plan.

- The report shall include methods of protection, control and restorative work as necessary, and shall be prepared by a soils engineer (as defined in LAMC Section 91.0420) and an engineering geologist certified by the State of California, and address potential earthquake hazards.

- The slope protection plan and erosion restoration plan shall be prepared in collaboration with a landscape architect.

- Prior to issuance of any grading or building permit, all building plans shall be signed by the preparer of the soils and geology report certifying that all necessary recommendations for grading, slope protection, foundations, erosion restoration, retaining walls and drainage made in the report have been incorporated into the development.

14. Sediment basins will be required on any area which has a slope equal to or steeper than 1.5:1 (66.7 percent). These devices shall be required prior to or concurrent with the initial soil disturbance and maintained through the development process to minimize sediment from run-off waters or gravity flow during construction.

15. No grading permit shall be issued until the Department of Building and Safety has performed a grading pre-inspection report to determine that there has been no unpermitted or illegal dumping or grading on the site.

16. No grading of property shall be permitted from November 1st to April 15th inclusive unless erosion control plans have been submitted to and approved by the Department of Building and Safety prior to the issuance of a building permit.

17. The Applicant shall comply with the Best Management Practices for storm water quality. These practices shall be in compliance with Order No. 96-054, National Pollutant Discharge Elimination System (NPDES), Permit CAS614001 issued by the Regional Water Quality Control Board (RWQCB) to the County of Los Angeles and local agencies.

18. An interest bearing account shall be established by the developer that would defray the City's cost of occasional mobilization to clean debris and erosion damage along

Cabora Drive. In addition, the City may require a small debris wall (two to three feet high) be constructed at the toe of the natural slope to intercept and retain eroded soils to help maintain access between maintenance activities.

In addition to the above mitigation and code compliance measures, the following measure is recommended, if required by the Department of Building and Safety, to further stabilize the natural slope:

19. Existing erosional features along the bluff face would be removed and replaced with a manufactured slope. This manufactured slope would be constructed at the natural gradient of the bluff face and would be reinforced with the aid of geofabrics (e.g., Tensar, etc.).

The following measure has been added by the project Applicant in order to minimize construction impacts.

20. The Applicant shall provide to all project construction contractors a copy of the Applicant's Required Construction Practices for the West Bluffs Project (see Appendix B of the Subsequent Final EIR). These practices shall be adhered to during project construction.

Environmental Impact After Mitigation

The project's less than significant grading impacts would be further reduced after implementation of the mitigation measures.

Cumulative Impact

Impacts related to geology and soils are based primarily on site-specific conditions. Cumulative grading impacts would be minimized as development of the related projects would be subject to requirements similar to those imposed on the project to reduce impacts. As such, significant cumulative impacts to grading are not anticipated.

IV. A. 2. GEOLOGIC HAZARDS - SEISMICITY

Environmental Impact

Potential impacts associated with geologic hazards and seismicity were analyzed on the basis of exposing people or property to increased risks as compared to what is already present in the southern California region. No active faults are known to exist along or cross the project site and the threat of seismic hazards on the proposed project site would not be greater for the project site than any other location within the Los Angeles region. Consistency with design and construction standards, as delineated in state, county, and city seismic, building, and development codes would reduce impacts of potential seismic hazards to people, property, or infrastructure to less than significant levels. The project impact would be less than significant.

Mitigation Measures

Project implementation would result in a less than significant impact with regard to seismic hazards, and therefore, no mitigation and code compliance measures are required to reduce project significance. However, the following mitigation measures are recommended to ensure minimal seismic impacts would occur as part of the proposed development:

1. The project shall be designed and built to sustain the effects of both the maximum credible and maximum probable groundshaking effects of an earthquake in conformance with the City of Los Angeles Seismic Safety plan, applicable portions of the Municipal Code and seismic safety requirements of the Department of Building and Safety, which include Division 23, Section 91.2305 (earthquake regulations) of the City of Los Angeles Building Code.

2. The structural design of the buildings shall be in conformance with the recommendations included in geotechnical reports-prepared for the project and approved by the Department of Building and Safety. The information about ground motion included in the project geotechnical report shall be used as input for the seismic design of buildings.

3. The project shall conform to criteria set forth in the Recommended Lateral Force Requirements and Commentary by the Structural Engineers Association of California.

Environmental Impact After Mitigation

The project's less than significant seismic impacts would be further reduced after implementation of the mitigation measures.

Cumulative Impact

Development of the proposed project and related projects would result in a greater concentration of people in the Los Angeles area being exposed to seismic hazards. However, consistency with all state, county, and city building and seismic regulations, as well as project-specific geotechnical recommendations would reduce cumulative impacts to less than significant levels.

IV. B. 1. AIR QUALITY

Environmental Impact

An analysis of the potential air quality impacts of the proposed project was conducted for both construction and post-construction operation of the project. The estimated quarterly average project-related construction emissions are summarized as follows: 3.85 tons/quarter of CO; 0.51 tons/quarter of ROC; 5.6 tons/quarter of NO_x; 0.64 tons/quarter of SO_x; and 18.63 tons/quarter of PM_{10}. The estimated daily average project-related construction emissions are summarized as follows: 114 pounds per day of CO; 15 pounds per day of ROC; 166 pounds per day of NO_x; 19 pounds per day of SO_x; and 552 pounds per day of PM_{10}. Estimated construction emissions would exceed SCAQMD quarterly and daily thresholds for NO_x and PM_{10}. Emissions of these pollutants would result in significant short-term regional air quality impacts. Estimated quarterly and daily construction emissions for CO, ROC, and SO_x would be below the significance thresholds resulting in adverse, but less than significant impacts.

The estimated daily emissions associated with post-construction operation of the project are summarized as follows: 260 pounds per day of CO; 19 pounds per day of ROC; 28 pounds per day of NO_x; 2 pounds per day of SO_x; and 3 pounds per day of PM_{10}. Operational emissions would not exceed SCAQMD thresholds for any of the criteria pollutants and impacts would be adverse, but less than significant. Localized air quality impacts in terms of CO concentration emissions attributable to project-generated traffic would also be less than significant. In addition, the proposed project would result in less than significant impacts in terms of project consistency with adopted are quality plans and policies.

Mitigation Measures

The following mitigation measures set forth a program of air pollution control strategies designed to lessen the project's significant air quality impacts:

Construction

Land Clearing/Earth-Moving

1. The Applicant shall secure any necessary permits from the SCAQMD, including an approved fugitive dust emissions control plan pursuant to SCAQMD Rule 403.

2. Non-toxic soil stabilizers shall be applied according to manufacturers' specifications or vegetation shall be planted on all inactive construction areas (previously graded areas inactive for 10 days or more and not scheduled for additional construction activities within 12 months, to the extent feasible).

3. Exposed pits (i.e., gravel, soil, dirt) with 5 percent or greater silt content shall be watered twice daily, enclosed, covered or treated with non-toxic soil stabilizers according to manufacturers' specifications.

4. All other active sites shall be watered at least twice daily.

5. All grading activities shall cease during second stage smog alerts and periods of high winds (i.e., greater than 25 mph) if dust is being transported to off-site locations and cannot be controlled by watering.

6. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer).

7. A construction relations officer shall be established by the Applicant to act as a community liaison concerning on-site construction activity, including resolution of issues related to fugitive dust generation.

Paved Roads

8. All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite, or shall be paved.

9. Streets shall be swept hourly if visible soil material has been carried onto adjacent public paved roads (reclaimed water shall be used if available.)

10. Construction equipment shall be inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

Unpaved Roads

11. Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

12. Traffic speeds on all unpaved roads shall not exceed 15 mph.

The mitigation measures identified above implement SCAQMD measures associated with on-site grading activities, construction equipment travel on paved roads as well as the SCAQMD's intent to control fugitive dust emissions associated with construction equipment travel on on-site unpaved roads and demolition activities.

Operation

No long-term mobile source or stationary source mitigation measures are necessary.

Environmental Impact After Mitigation

The project's significant NO_x and PM_{10} emissions during construction would be reduced after implementation of mitigation measures, but would remain significant.

The project's less than significant impacts associated with project occupancy would not require any mitigation measures during the operational phase.

Cumulative Impact

Because the construction-related emission levels associated with the project are anticipated to result in a significant impact, a significant and unavoidable cumulative impact with respect to construction emissions would occur.

Operational emissions associated with buildout of the project and related projects to be built and operational within the project's time frame would likely exceed SCAQMD thresholds for CO, ROC and NO_x. Cumulative air quality impacts would therefore be significant and unavoidable.

IV. B. 2. METEOROLOGY (WIND EFFECT)

This environmental issue was determined not significant in the Initial Study.

IV. C. 1. SURFACE WATER RUNOFF/HYDROLOGY

Environmental Impact

The proposed project would leave approximately 38 percent of the site undeveloped. The remainder of the site would be developed with single-family housing and street surfaces, with a resulting increase in impervious area. The West Bluffs Storm Drain would increase peak flows to the Lincoln Boulevard Storm Drain by a total of 124 cfs. The proposed storm drain system would be designed to accommodate all of the increased storm drain flows which would result from the proposed project and alleviate some off-site nuisance flooding as well and impacts to surface water runoff and hydrology would be less than significant.

Mitigation Measures

The proposed drainage system will mitigate storm water flow impacts to a less than significant level. Mitigation measures proposed below are recommended to further reduce impacts associated with storm water runoff:

1. The design of the on-site storm water drainage system shall be submitted to the City Engineer for review and approval prior to development of any drainage system improvements.

2. All proposed drainage improvements shall meet applicable requirements from the Department of Building and Safety and other responsible agencies.

3. The project shall comply with applicable provisions of the Flood Hazard Management Specific Plan Ordinance (No. 154,405).

4. The following Best Management Practices shall be implemented:

   - To absorb oil and grease present in storm water runoff catch basin filters will be installed on the 13 on-site and 5 off-site catch basins.

   - A catch basin maintenance program will be developed and approved by the City of Los Angeles' Storm Water Management Division. The program will include provisions for periodic inspections, debris removal, local area cleanup, and replacement of filter materials. In addition, the program will include a funding mechanism.

   - Catch basin maintenance program will coordinate with the Storm Water Management Division on the placement of "No Dumping" or "Drains to the Wetlands" signs at all the catch basins on-site.

   - Information regarding the city's mobile collection program, or a stationary collection site if the city has one in the area or businesses in the area certified to take in household hazardous waste shall be given to new home buyers by the homebuilder at the time of new home purchase.

Environmental Impact After Mitigation

The project's less than significant surface water and hydrology impacts would be further reduced after implementation of the mitigation measures.

Cumulative Impact

None of the related projects are located within the conveyor areas into which the proposed project's flows would drain. Therefore, no cumulative increase in drainage flow is anticipated.

IV. C. 2. GROUND WATER

This environmental issue was determined not significant in the Initial Study.

IV. C. 3. FLOOD HAZARD/MUDFLOW HAZARD

This environmental issue was determined not significant in the Initial Study.

IV. D. PLANT LIFE AND ANIMAL LIFE

Environmental Impact

Construction-related impacts could deter use of the remaining on-site and nearby habitat by wildlife resulting in adverse, but less than significant, impacts. Project implementation would result in the loss of existing Diegan sage scrub, non-native grassland, ruderal vegetation, CDFG-regulated streambeds and Corps-regulated wetlands and "Waters of the United States." As habitat values of the jurisdictional streambeds were acknowledged by CDFG to be minimal, the filling of 0.141 acres of jurisdictional streambeds would require a Section 1601 "Streambed Alteration Agreement" between the Applicant and CDFG, but would not represent a significant impact upon biological resources. The discharge of fill materials into approximately 0.15 acres of jurisdictional "Waters of the United States" including 0.04 acres of wetlands and 0.08 acres of "waters" would necessitate acquisition of a Section 404 Nationwide Permit from the Corps as part of the project permitting process. However, the Corps jurisdictional drainages represent the same drainages subject to CDFG regulatory authority and filling of these areas would not result in significant impacts to biological resources.

No sensitive mammal species utilize the project site or would be affected by project implementation. Project implementation may result in loss of minor amounts of foraging habitat and nesting sites for the loggerhead shrike and Californian horned lark, as well as habitat for the silvery legless lizard. Such impacts could affect local populations of these species, but would not result in significant impacts to the regional populations of these species, as additional on and off-site habitat remain. Project implementation would also result in the removal or overcovering with fill material of habitat at the mouth of Hasting's Canyon for caterpillar phacelia, the host plant species of *Encosma hennei* (Henne's eucosman moth). However, given the unlikelihood of the presence of the moth on-site, loss of this habitat is considered less than significant.

Proposed restoration of sage scrub habitat along the bluff faces would have a net beneficial impact upon wildlife on the project site and in the project area.

Mitigation Measures

Project implementation would result in less than significant impacts to biological resources and, therefore, no mitigation measures are required to reduce project impacts on biological resources. However, CDFG and the Corps require fulfilment of the mitigation measures identified below as a result of project impacts to CDFG jurisdictional streambeds and Corps jurisdictional wetlands and "waters." Additional mitigation measures are recommended in order to ensure minimization of impacts to on-site and off-site biological resources:

CDFG Mitigation Measures

1. The Applicant shall be responsible for habitat enhancement to existing Diegan sage scrub habitat and removal of exotic vegetation on the bluff face below the project area. The mitigation area shall be comprised of no less than 0.90 acres, which represents a mitigation ratio of 5:1. As established by CDFG policy, the location of the mitigation area and precise restoration requirements shall be coordinated between responsible and trustee agencies following certification of the EIR. However, the mitigation program shall be developed by a qualified biologist and/or restoration specialist and shall follow accepted standards for exotic plant removal and native habitat enhancement. The mitigation program shall be developed in coordination with the Friends of the Ballona Wetlands and implemented in such a way so as not to adversely impact planned restoration of the freshwater marsh and riparian corridor under the First Phase of the Playa Vista project.

Corps Mitigation Measures

2. The mitigation required for the discharge of fill materials into jurisdictional waters of the United States will be determined by the Corps during the Section 404 Nationwide Permit process. The mitigation requirements would be developed by the Corps in cooperation with CDFG and the USFWS. The Applicant would be responsible for the development of a mitigation plan in accordance with the Corps' Mitigation and Monitoring Guidelines and would include those measures required by CDFG.

General Mitigation Measures

3. Temporary fencing, stakes, flags or other markers shall be erected around bluff areas intended for preservation to establish the limits of grading and construction-related disturbance.

4. Construction personnel shall be briefed in the field regarding presence of protected bluff areas and prohibitions against operation or storage of construction equipment near or in such areas, except as necessary to access bluff faces to effect erosion or slope control.

5. Construction site access shall be routed so as to avoid protected bluff areas and the Ballona Wetlands. All construction activity and vehicular traffic generated by the proposed project shall be limited to areas targeted to be graded for construction or erosion and slope control.

6. No dumping of trash or storage of construction materials shall occur within protected bluff areas or at the base of the bluffs.

7. Refueling and maintenance of construction vehicles shall be conducted away from drainages, bluff faces and wetland areas at the base of bluffs, and shall be restricted to areas designated for refueling and maintenance. All such areas shall be protected by temporary berms to contain any potential spill.

8. Landscaping of the open space lots shall be with native plants typically found associated with or adjacent to coastal sage scrub habitats. Plant species selected shall include appropriate species currently found on the site and those species that historically were present on the site.

9. Landscape plans for the remainder of the project site, including plans for single-family dwellings, shall be subject to review by the City Planning Department, in accordance with Section 12.40 of the City of Los Angeles Planning and Zoning Code.

10. All lots backing up to protected bluff areas shall be fenced to minimize opportunities for intrusion into protected bluff areas by humans or domestic pets. No direct access to bluff face open space lots shall be permitted for project residents except as provided by designated trail access.

11. Erosion control measures to be employed during construction shall include rapid revegetation, sand bagging, use of straw bales or temporary sedimentation basins to control the potential for sediment impacts to the Ballona Wetlands, and the riparian corridor during all stages of project construction.

Environmental Impact After Mitigation

The project's less than significant plant and animal life impacts would be further reduced after implementation of the mitigation measures.

Cumulative Impact

Continuing development of the project area has the potential to eliminate local natural resources and increasingly impact the Ballona Wetlands freshwater and estuarine habitats. However, with the exception of the Playa Vista project, the related projects are generally located in already urbanized areas and represent infill development. The project's contribution to cumulative impacts is not considered to be significant, due to the disturbed nature and correspondingly low resource value of the project site. Retention and restoration of bluff face habitat would result in a net beneficial impact upon resource values and would augment planned bluff restoration efforts associated with the First Phase of the Playa Vista Project.

IV. E. ANIMAL LIFE

This environmental issue is evaluated in Section IV.D., Plant and Animal Life.

IV. F. NOISE (CONSTRUCTION, MOBILE AND STATIONARY)

Environmental Impact

Project noise impacts are analyzed in terms of construction noise, operational noise due to mobile sources, operational noise due to stationary sources, and aircraft noise from LAX and Raytheon Systems Company. Project construction vehicles equipped with mufflers would generate noise levels ranging from 63.5 to 86.0 dB(A) at distances ranging from 50 to 400 feet from the source on site during the construction period and would result in a temporary significant impact on noise levels during the construction phase. Operational noise attributable to project-related and cumulative mobile sources (i.e., due to traffic on area roadways) would exceed the "normally acceptable" community noise standard at two locations: near Lincoln Boulevard and 83rd Street and at Lincoln Boulevard and Hughes Terrace. However, the project contribution to

these noise levels would be 0.1 dB(A), a less than discernable increase. The project would not result in an adverse impact upon the noise environment in the local area due to mobile sources. Operational noise due to stationary sources (i.e., residential HVAC systems) would not exceed "clearly acceptable" noise classification standards for residential areas and would not create any adverse impacts.

Once developed, the proposed project would be considered a sensitive receptor due to it being a residential land use. The future projected LAX aircraft noise contours are less than 65 dB(A) at the project site which are below the Noise Compatibility Guidelines for residential areas. In addition, noise levels from current helicopter operations are also below the Noise Compatibility Guidelines. Therefore the residential land uses of the proposed project would not be significantly impacted from exposure to excessive noise levels attributable to local aircraft.

Mitigation Measures

The following mitigation measures are recommended to reduce noise impacts during construction activities; no mitigation is required for operational impacts:

1. Structural construction work shall be limited to the hours of 7:00 A.M. - 6:00 P.M. Monday-Friday and 8:00 A.M. - 6:00 P.M. Saturday.

2. Construction contracts shall require project contractors to use power construction equipment with noise shielding and muffling devices.

3. During construction, the project shall comply with applicable LAMC Section 112.03 (City Noise Ordinance Number 144,331) and its subsequent ordinances.

4. Where construction activity occurs within 500 feet of residences, temporary noise walls shall be erected between the project site and the residences.

Environmental Impact After Mitigation

Construction activities would generate short-term intermittent noise level ranges of approximately 63.5 to 86.0 dB(A) at adjacent residences, which would be a temporary significant adverse impact. The project's significant construction-generated noise impacts would be reduced to a less than significant level after implementation of the mitigation measures.

The project would have a less than significant impact in terms of exposure to excessive noise levels and no mitigation measures are recommended or required.

Cumulative Impact

Since increases in noise levels due to the related projects are less than 3 dB(A) and would not cause a discernable change in existing ambient noise levels, they would not result in a significant cumulative impact upon the noise environment.

IV. G. LIGHT AND GLARE

This environmental issue was determined not significant in the Initial Study.

IV. H. LAND USE

Environmental Impact

Land use impacts are analyzed based on the project's consistency with applicable federal, state, or regional land use plans; the goals policies or objectives of the City of Los Angeles General Plan; and relevant zoning regulations of the City of Los Angeles Planning and Zoning Code.

Because the California Coastal Zone Boundary does not readily conform to the lot lines of Tentative Tract Map No. 51122, which are above and set back from the bluff face, a Minor Coastal Zone Boundary Adjustment Request would be processed as part of the entitlement process. As the project is consistent with all of the applicable policies of Chapter 3 of the California Coastal Act, and the boundary adjustment would create a net increase of the Coastal Zone area, approval of Coastal Development Permits from both the City of Los Angeles and the California Coastal Commission would be anticipated and no significant impacts would occur.

The project would be consistent with applicable regional plans including the Growth Management Chapter of SCAG's Regional Comprehensive Plan and Guide, the SCAQMD's Air Quality Management Plan, and the Los Angeles County Congestion Management Plan. As such, no significant impacts upon regional land use plans would result.

Tentative Tract Map Approval would ensure compliance with all of the applicable development regulations for the Westchester/Playa del Rey District Plan's land use designations. The project would be consistent with the land use designations of the Community Plan as well as

specific development guidelines and policies contained within the Coastal Bluffs Specific Plan and the Playa Vista Area B Specific Plan. The project would also be consistent with other applicable Elements of the General Plan, including the Scenic Highways Plan, the Bicycle Plan, the Public Recreation Plan, the Safety Plan, and the Conservation Plan. Therefore, no significant impacts would result in terms of the project's consistency with the City of Los Angeles General Plan.

The proposed Tentative Tract Map No. 51122 is also consistent with all applicable zoning requirements of the City of Los Angeles Planning and Zoning Code, and therefore, no significant impacts would result.

Mitigation Measures

Since the proposed project would not have a significant impact on land use, no mitigation measures are recommended or required.

Environmental Impact After Mitigation

The project's less than significant impacts in terms of consistency with land use plans would not require any mitigation measures.

Cumulative Impact

The related projects, in conjunction with the proposed project, would cumulatively add to population growth within the District Plan area. However, the anticipated growth is within plan projections and no significant cumulative land use impacts would occur.

IV. I. NATURAL RESOURCES

This environmental issue was determined not significant in the Initial Study.

IV. J. RISK OF UPSET/HUMAN HEALTH

This environmental issue was determined not significant in the Initial Study.

IV. K. POPULATION

This environmental issue is evaluated in Section IV.L., Population and Housing.

IV. L. POPULATION AND HOUSING

Environmental Impact

The estimated population on the project site is expected to be 321 people, representing an increase of approximately 0.6 percent over the estimated existing population in the Westchester-Playa del Rey Community Plan area. This increase is within adopted city and SCAG population projections, and would therefore not stimulate growth or induce discontinuous development patterns in a way inconsistent with city, county or regional growth policies.

The proposed project would contribute 120 single-family dwelling units to the available housing stock. This increase represents 8.2 percent of the projected increase in dwelling units for the area between 1997 and 2002, which would not exceed adopted housing projections for the Community Plan area. In addition, the proposed project would be substantially less than the maximum density allowed for the project site by the Plan. Thus, the housing proposed by the project is consistent with capacity information provided in the Community Plan and does not exceed SCAG and City of Los Angeles housing forecasts for the Community Plan area, and therefore, would not result in a significant impact.

Mitigation Measures

Since the proposed project would not have a significant impact on population or housing, no mitigation measures are recommended or required.

Environmental Impact After Mitigation

As no population and housing mitigation measures are required by the proposed project, impacts would remain less than significant.

Cumulative Impact

Cumulative development of the related projects within the Westchester-Playa del Rey Community Plan area would result in a population increase of 7,629 people within the Community Plan area between 1997 and 2002. This increase reflects a 15 percent increase over the existing population, and represents approximately 13.2 percent of the Community Plan area's remaining population capacity, and therefore, would not result in a significant impact. An additional 3,246 housing units would result from development of the related projects in the Community Plan area between 1997 and 2002 and would not exceed the planned housing capacity for the Community

Plan area. As cumulative population and housing growth resulting from development of the related projects would be well within the projections of the Community Plan, no significant cumulative population and housing impacts would occur.

IV. M. RIGHT OF WAY AND ACCESS

This environmental issue is evaluated in Section IV.N.1., Traffic and Access.

IV. N. 1. TRAFFIC AND ACCESS

Environmental Impact

Development of the project would have short-term effects on vehicular traffic during the grading and excavation phase and the housing construction phase. During this phase no haul traffic would occur in the neighborhood areas surrounding the project site and employee trips and haul truck trips would result in fewer than 15 trips during either the A.M. or P.M. peak hours. This volume of traffic would be minimal, and would result in a less than significant impact. Housing construction for the project is estimated to take approximately two and one-half years, or approximately 48 homes per year, depending upon market influences. Employee trips during this construction period are estimated at approximately 400 per day, or approximately 25 to 30 trips during the peak hours. This number of trips is considered minimal and less than significant and would be experienced on a short-term basis only. During all phases of construction, all vehicles, including construction employee vehicles, would be parked on the project site. Therefore, no parking impacts would occur to surrounding streets.

Upon completion and occupancy, the proposed project is expected to produce approximately 1,220 trips per day, with approximately 95 trips occurring during the morning peak hour, and 128 trips occurring during the evening peak hour. Future intersection traffic conditions including project and cumulative traffic would generally range from LOS A to LOS D during both peak hours although the intersection of Lincoln Boulevard and 83rd Street would operate at LOS F during the A.M. peak hour. However, based on LADOT criteria, project generated traffic would not result in a significant impact at this location. In addition, the project is not expected to produce significant traffic impacts on any of the surrounding local streets.

Mitigation Measures

The proposed project is not expected to result in any traffic impacts at the study intersections or on the surrounding residential neighborhood streets, and no improvements are

warranted in this regard. However, the following measures would be implemented as part of the project, in order to facilitate adequate access to and from the project site during the construction and operation phases.

1. The project developer shall obtain haul route approval for all excavated materials from the City Department of Building and Safety. No transport of excavated materials shall be permitted on roads less than a secondary highway.

2. One flag person shall be required at the project site and dump site to assist the trucks in and out of the area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."

3. Neighborhood Traffic Intrusion Program: The project shall also implement a comprehensive Neighborhood Traffic Intrusion Program for the area bounded generally by the project site on the north, Lincoln Boulevard on the east, Manchester Boulevard on the south, and generally Gulana Avenue on the west. Measures within this area could include corridor level improvements to Manchester Boulevard and Lincoln Boulevard, such as traffic signal coordination, turn restrictions at local street intersections, and additional turning lanes at the intersection of Manchester Avenue and Lincoln Boulevard, to make these facilities more attractive to traffic. Additional measures within the neighborhood itself could include additional stop signs, speed humps, and/or traffic circles to further increase the attractiveness and safety of the neighborhood. Detailed discussions of such a program, and its effects on traffic in and around the project site are currently under consideration and shall be designed in accordance with LADOT requirements.

4. Construction-related traffic shall access the project site via "A" Street, whenever possible, once it is constructed. Further, construction vehicles shall park within the project site, whenever possible.

5. The Applicant is working with Caltrans in the design of the necessary roadway dedications and improvements along the Lincoln Boulevard frontage of the site.

Environmental Impact After Mitigation

The project's less than significant traffic impacts would be further reduced after implementation of the recommended traffic improvement measures.

Cumulative Impact

The analysis of project traffic impacts is based on methodologies which incorporate the cumulative effects of traffic from general growth and anticipated nearby related projects. Therefore, no significant cumulative impacts are expected.

IV. N. 2. PARKING

This environmental issue is evaluated in Section IV.N.1., Traffic and Access.

IV. N. 3. ACCESS

This environmental issue is evaluated in Section IV.N.1., Traffic and Access.

IV. O. 1. FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES

Environmental Impact

The nearest first-due engine and truck company is 1.5 miles from the project site. Fire protection services for the proposed project are therefore considered adequate on the basis of the response distance to the site from existing engine companies. Project plot plan review by the Fire Department would determine the locations of the public hydrants on the property and any additional improvements to the water system in this area which would be required to provide 2,000 GPM fire-flow, with these improvements being provided by the Applicant. As the project will comply, no significant impacts are anticipated.

The estimated increase in emergency medical service responses generated by the proposed project would not be expected to significantly impact emergency medical services. The project will be designed in accordance with Los Angeles Municipal Code requirements, including regulation street widths, street lighting and street signage. The number of intersections operating at LOS E or LOS F would not increase with implementation of the project, and therefore, no significant impact in terms of emergency access would result.

Mitigation Measures

While significant impacts are not expected and therefore mitigation is not required, the following mitigation measures are recommended in order to ensure that project impacts will not be significant. These measures combine previous project mitigation measures and recent measures recommended by the Los Angeles City Fire Department.[2]

1. The project shall comply with all applicable state and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (CPC 19708).

2. Emergency access shall be via: (1) the project entry road, "A" Street, which will connect Lincoln Boulevard to "B" Street and the rest of the project internal street system, and (2) via a 20-foot wide gated emergency access driveway constructed to City of Los Angeles standards, which will permit emergency vehicle access to the project from the existing residential street system between Berger Avenue and the "E" Street cul-de-sac.

3. Plot plans shall be submitted indicating access road and turning area for Fire Department approval.

4. Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.

5. The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

6. Fire lanes, where required, and dead-ending streets shall terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane shall be greater than 700 feet in length without a secondary access being provided.

7. On-site hydrants may be required after review of plot plans.

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[2] *Richard Olsen, Assistant Fire Marshall, Los Angeles City Fire Department, Bureau of Fire Prevention and Public Safety, memorandum regarding Fire Department recommendations for Tract Map No. 51122 to Darryl Fisher, Supervisor, Department of City Planning, October 30, 1997.*

Environmental Impact After Mitigation

The project's less than significant fire protection impacts would be further reduced after implementation of the mitigation measures.

Cumulative Impact

The cumulative impact of the estimated population increase is expected to collectively increase the city's fire protection and emergency medical services load. Under the conditions of approval for VTTM 49104, a new fire station will be provided as part of the Playa Vista First Phase Project. The new station will be located within 1.0 mile of the Playa Vista Entertainment, Media and Technology District (EMT District) and will be adequate to handle all cumulative service demands, including those of the EMT District. In addition, the number of intersections operating at LOS E or F would not increase, thus no significant cumulative impacts in terms of emergency access would occur.

Hospitals in the area have adequate available space to accommodate approximately twice as many patients than are currently accommodated, and no significant cumulative impacts would be expected to occur upon hospital services.

IV. O. 2. POLICE PROTECTION

Environmental Impact

Impacts on police protection services were analyzed in terms of whether either of the following would result: (a) the population increase resulting from the project would substantially reduce the existing officer to population ratio of the Pacific Area; or (b) emergency response times would be inhibited by increasing roadway congestion within an area either during construction or upon post-construction occupancy. Based on the estimated residential population increase from the proposed project (approximately 321 residents), an additional 0.6 officers would be required to maintain existing service levels. As the population increase associated with the project would not substantially reduce the existing officer to population ratio, the project impact is considered adverse, but not significant. The number of intersections operating at LOS E or F would not increase with implementation of the proposed project, and therefore, no significant impact on access would result.

Mitigation Measures

Implementation of the following recommended mitigation measures are expected to reduce project impacts on LAPD services.

1. The Applicant shall contact the Police Department's Crime Prevention Section for advisement on crime prevention features that could be incorporated into the design of this project, including Neighborhood Watch.

2. Prior to recordation of the Final Tract map, the Applicant shall provide the Pacific Area Commanding Officer with a diagram of the project, including access routes, addresses, and any information that might facilitate police response.

3. The Applicant shall install street lighting on all streets within the subdivision.

4. Emergency access shall be via: (1) the project entry road, "A" Street, which will connect Lincoln Boulevard to "B" Street and the rest of the project internal street system, and (2) via a 20-foot wide gated emergency access driveway constructed to City of Los Angeles standards, which will permit emergency vehicle access to the project from the existing residential street system between Berger Avenue and the "E" Street cul-de-sac.

Environmental Impact After Mitigation

The project's adverse but less than significant police protection impacts would be further reduced with implementation of the mitigation measures. Potentially significant emergency access impacts would be reduced to a less than significant level after implementation of the mitigation measures.

Cumulative Impact

According to the LAPD, the proposed project would have a cumulative impact on police services in the area. In order to maintain the current level of police service in the Pacific Area, additional officers may be needed. However, a new police station required by the Playa Vista First Phase development will be adequate to handle all Playa Vista First Phase police service demands, including those of the EMT District, and would thus reduce cumulative impacts on police services in the Pacific Area.

The number of intersections operating at LOS E or F would not increase with implementation of the proposed and related projects, and therefore, no significant cumulative impacts on emergency access would result.

IV. O. 3. SCHOOLS

Environmental Impact

Impacts on schools were analyzed in terms of whether the project would create or exacerbate over-capacity conditions at schools which serve the project area. An estimated 99 total students would be generated by the proposed project, including 42 elementary school students, 24 middle school students and 33 high school students. The elementary and middle schools serving the project area are projected to have sufficient space to accommodate these elementary and middle school students, and therefore, the project is not anticipated to result in significant impacts to District elementary or middle school services. The 33 high school students expected to be generated by the proposed project would exacerbate a projected student space deficit at Westchester Senior High School. However, since the required minimum developer fees for capital improvements and acquisitions exceed the average in-place cost of several portable classrooms, no significant impact would result.

Mitigation Measures

Implementation of the following code compliance measure would be expected to reduce project impacts on schools in the area and no further mitigation measures would be required:

1. The Applicant shall pay developer fees, as required under Section 65995 of the California Code, for school improvements.

Environmental Impact After Mitigation

With implementation of the code compliance mitigation measure, the project's school impacts would be reduced to a less than significant level.

Cumulative Impact

With payment of school impact fees by each of the residential related projects, no cumulative significant impacts upon school services would occur. Although non-residential projects are not expected to directly generate students, a small additional increase in students may

result if employees associated with new commercial development in the area apply to send their children to local schools. However, such increases are not anticipated to be significant due to the additional available capacity at elementary, middle, and senior high schools serving the project area.

IV. O. 4. PARKS AND RECREATION

Environmental Impact

Impacts on parks and recreation were analyzed in terms of whether the project would provide adequate park area or in-lieu fees. The project provides a total of 1.96 acres of park area, including trails, which does not fully satisfy the Municipal Code requirement of 2.1 acres, and additional park/recreational elements or in-lieu fees would be required. By land dedication, provision of private park space for residents, payment of in-lieu fees or a combination thereof, the project would fully mitigate project impacts on parks.

Mitigation Measures

The following code compliance measure is recommended to mitigate park and recreation impacts associated with the proposed project:

1. The Applicant shall conform with city park requirements of Section 17.12 of the City of Los Angeles Planning and Zoning Code by land dedication, the provision of private park space for residents, payment of in-lieu fees, or a combination thereof.

Environmental Impact After Mitigation

The project's significant parks and recreation impacts would be reduced to a less than significant level after implementation of the code compliance measure.

Cumulative Impact

Under Municipal Code Section 17.12, all of the residential or mixed-use residential related projects would be required to provide additional park space or fees in-lieu of such space. Since related resident-generating projects would be required to mitigate park impacts by land dedication, the payment of in-lieu fees or a combination of both, no significant cumulative impacts would result.

IV. O. 5. LIBRARIES

Environmental Impact

Impacts on libraries were analyzed in terms of whether the project would create or substantially exacerbate an existing branch deficit. The influx of library users resulting from the project would generate additional demand for library service. Since the closest library to the project site, the Loyola Village Branch, is operating at levels over capacity, even the relatively small one percent added demand for services generated by the proposed project would be considered a significant impact. This impact would continue until the LAPL successfully implements planned library improvements.

Mitigation Measures

The following measures are recommended to reduce project impacts on library services to a less than significant level:

1. City implementation of the proposed expansion plans for the Loyola Village Branch Library would reduce project impacts on library services to less than significant. The Applicant shall provide a fair share payment toward the cost of such planned expansion.

Environmental Impact After Mitigation

The project's significant library impacts would be reduced to a less than significant level after implementation of the mitigation measures.

Cumulative Impact

Based on the related projects list and capacity analysis at the library closest to the project site, no additional cumulative demand would be anticipated.

IV. P. ENERGY CONSERVATION

Environmental Impact

Energy conservation impacts were analyzed in terms of whether the project would substantially increase the demand for energy such that existing or planned capacity of distribution

systems or available supply would be exceeded. Consumption estimates were generated for fuel resources during construction, as well as for electricity, natural gas and fuel resources during operation.

The estimated fuel consumption associated with construction of the proposed project (127,491 gallons of diesel and 21,995 gallons of gasoline) would represent an incremental increase when compared to regional fuel supplies and would thus not result in a significant impact upon existing fuel resources. The proposed project would consume approximately 675,180 kilowatt-hours of electricity and 9,598 thousand cubic feet of natural gas per year. It is anticipated that development of the proposed project would not significantly impact the supply of electricity or natural gas or exceed the planned capacity of existing electricity or natural gas distribution systems. The estimated fuel consumption associated with the proposed project (approximately 131,720 gallons per year) would represent an incremental increase when compared to regional fuel supplies and would not result in a significant impact upon existing fuel resources.

Mitigation Measures

Although no long-term environmental impacts on energy resources are anticipated with development of the proposed project, the following energy conservation mitigation measures have been recommended by the DWP to maximize energy efficiency and conservation:

1. Project built-in appliances, refrigerators, and space-conditioning equipment should exceed the minimum efficiency levels mandated in the California Code of Regulations.

2. Project buildings shall be designed and constructed to be well-sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads.

3. A performance check of the installed space-conditioning system shall be completed by the developer/installer prior to issuance of the certificate of occupancy to ensure that energy-efficiency measures incorporated into the project operate as designed.

4. Exterior walls shall be finished with light-colored materials and high-emissivity characteristics to reduce cooling loads. Interior walls shall be finished with light colored materials to reflect more light and, thus increase lighting efficiency.

5. Thermal insulation which exceeds requirements established by the California Code of Regulations shall be installed in walls and ceilings.

6. Window systems shall be designed to reduce thermal gain and loss, thus, reducing cooling loads during warm weather and heating loads during cool weather.

7. Install fluorescent and high-intensity-discharge (HID) lamps, which give the highest light output per watt of electricity consumed, wherever possible including all street and parking lot lighting to reduce electricity consumption.

8. Project structures shall be designed such that natural ventilation may be utilized, wherever possible.

9. The project shall comply with Section 66473.1 of the State Subdivision Map Act which requires that the design of new subdivisions "provide, to the extent feasible, for future passive or natural heating and cooling opportunities."

Environmental Impact After Mitigation

The project's less than significant energy impacts would be further reduced after implementation of the mitigation measures.

Cumulative Impact

Cumulative development is estimated to generate a demand for approximately 238,864,737 kWh of electric power and 436,516 Mcf of natural gas per year. The cumulative trip generation would result in consumption of approximately 19,132,925 gallons of gasoline and diesel fuel per year. These increases in fuel consumption represent an incremental increase when compared to regional fuel supplies and would result in a less than significant impact.

IV. Q. 1. POWER

This environmental issue is evaluated in Section IV.P., Energy Conservation.

IV. Q. 2. NATURAL GAS

This environmental issue is evaluated in Section IV.P., Energy Conservation.

IV. Q. 3. COMMUNICATION SYSTEMS

This environmental issue was determined not significant in the Initial Study.

IV. Q. 4. WATER CONSERVATION

Environmental Impacts

Impacts on water conservation or availability were analyzed in terms of whether the project would result in any of the following: (1) major extensions or expansions of the existing water conveyance systems, (2) exceedance of anticipated regional water supplies; and/or (3) excessive or wasteful amounts of water usage in violation of water conservation ordinances. The project would demand approximately 86,711 gallons per day (gpd) of water for domestic and landscaping uses. The existing and future water supply of the City of Los Angeles would be able to accommodate future water demand of the proposed project, and no significant impacts on water availability or distribution are anticipated.

Mitigation Measures

Although no significant impacts are anticipated with the proposed project, the following mitigation and code compliance measures are recommended to promote on-site water conservation:

1. Pipes and installation shall meet City of Los Angeles Department of Water and Power specifications and American Water Works Association standards.

2. The project developer shall install low flush toilets and low flow showerheads.

3. Plumbing fixtures shall be selected which reduce potential water loss from leakage due to excessive wear of washers.

4. The project shall comply with Xeriscape Ordinance No. 165,004, Water Conservation Ordinance No. 166,080, their subsequent ordinances, and all other applicable local and state regulations.

5. Pressure regulators shall be required in accordance with the Los Angeles City Plumbing Code for lots where pressures exceed 80 pounds per square inch (psi) at the building site elevation.

6. New fire hydrants and/or top upgrades to existing fire hydrants shall be required in accordance with the Los Angeles Fire Code.

7. Water-conserving measures in landscape management shall include:

   - Use of warm season grasses if lawn is planted.

   - Plants of similar water use grouped to reduce over-irrigation of low-water using plants.

   - Extensive use of mulch in all landscaped areas.

   - Installation of efficient irrigation systems that minimize runoff and evaporation and maximize the water that will reach the plant roots. Setting of automatic irrigation systems to insure irrigation during early morning or evening hours. Resetting of automatic irrigation system to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

Environmental Impact After Mitigation

The project's less than significant water conservation impacts would be further reduced after implementation of the mitigation measures.

Cumulative Impact

The City of Los Angeles does not anticipate any water availability shortfalls, as projected water supplies for the year 2010 are anticipated to far exceed the demands of the city assuming cumulative growth. Furthermore, as with the proposed project, each project requiring discretionary approval would be subject to a review process and to appropriate water conservation requirements and mitigation measures. Therefore, the cumulative water conservation impacts would be less than significant.

IV. Q. 5. SEWERS

Environmental Impact

Impacts on sanitary sewer systems were analyzed in terms of whether the proposed project would result in wastewater generation in excess of the capacity of existing or planned wastewater conveyance systems or wastewater treatment facilities serving the project site. The project would generate approximately 39,600 gallons of sewage per day. With the addition of appropriate new

sewer infrastructure, sewer line and sewer treatment capacity would be adequate to serve the project and no significant impact would occur.

Mitigation Measures

Although no significant impacts are anticipated with the proposed project, the following mitigation and code compliance measures are recommended to ensure adequate sewer service:

1. The project developer shall comply with the provisions of Ordinance No. 166,060 or subsequent ordinances regarding sewer capacity allotment in the City of Los Angeles.

2. The project developer shall comply with Ordinance No. 166,080 which requires that water saving devices be installed in all commercial, industrial and residential structures.

3. Design and construction of additional local sewers and/or house connection laterals shall be subject to approval from the Bureau of Engineering.

4. Sewage discharged from the project shall be disposed of in accordance with the requirements of the State Regional Water Quality Control Board.

Environmental Impact After Mitigation

The project's less than significant sewer infrastructure impacts would be further reduced after implementation of the mitigation and code compliance measures.

Cumulative Impact

The cumulative effect of construction and occupancy of all related projects and the proposed project would increase sewer demand within the related projects area by approximately 2.8 mgd. As this demand would be met by the planned 1998/1999 additional capacity of 120-170 mgd, cumulative impacts on sewer treatment capacity would be considered less than significant.

IV. Q. 6. STORM WATER DRAINAGE

This environmental issue is evaluated in Section IV.C.1., Surface Water Runoff/Hydrology.

IV. Q. 7. SOLID WASTE

Environmental Impact

Solid waste impacts were analyzed in terms of the extent to which existing or planned landfills would be able to accommodate solid waste generated by the project. Disposal of grading and construction-related waste would be limited and would not constitute a continuing generation of solid waste after construction activities are completed. Assuming full implementation of the 50 percent reduction requirement of AB 939 by the year 2000, it is estimated that the project would only generate about 600 pounds of solid waste per day (or approximately 110 tons per year). The project's incremental additional demand on existing solid waste systems and facilities would not result in a significant impact.

Mitigation Measures

The following mitigation measures would further reduce the amount of solid waste generated by the project, although cumulative impacts would remain significant due to anticipated shortfalls in landfill capacity:

1. All dwellings shall include built-in storage and sorting space for recyclable materials so that future residents will more easily be able to participate in curbside pick-up programs.

2. An educational/outreach program for initial project residents shall be provided outlining city regulations and project rules and penalties, locations of recycling facilities, and instructions on how to separate and prepare materials for recycling.

Environmental Impact After Mitigation

The project's less than significant solid waste impacts would be further reduced after implementation of the mitigation measures.

Cumulative Impact

The cumulative daily solid waste generation of the proposed project combined with related projects is estimated at 99,486 pounds per day. As the proposed project, in conjunction with the 2002 related projects and anticipated citywide growth, would collectively exasperate the already limited regional landfill capacity, a significant cumulative impact would occur. However, as it is

beyond the capability of individual projects to solve the regional landfill capacity problem, solutions to the solid waste disposal crisis are currently being sought after on a Countywide level.

IV. R. SAFETY

This environmental issue was determined not significant in the Initial Study.

IV. S. AESTHETICS AND VIEWS

Environmental Impact

Aesthetic and view impacts were analyzed from the existing Westchester neighborhood south of the site, the open space and developed neighborhoods north of the project site, and views associated with the new Lincoln Boulevard access. Near views from a few single-family homes along 80th Street, Rayford Drive, 81st Street and Berger Avenue would change from an area of semi-natural open space, to a neighborhood of single-family homes. Although the proposed project does not conflict with city regulations relating to view resources, development would significantly impact views of the site and beyond as seen from these homes and from other public vantages to the south of the project site.

Implementation of the proposed project would modify both the bluff top and bluff face as viewed from the north. Although the project would alter the view from Culver Boulevard, a Scenic Highway, to some extent, only a relatively limited portion of the view range would be affected and the project would have a substantially lesser impact than the existing nearby homes which terrace down the bluff face and the impact would not be considered significant. From other points north, particularly as one progresses closer to the project site from Culver and Jefferson Boulevards, the project's bluff top elements would affect a larger portion of the viewshed and could be considered significant by some.

For views associated with the new Lincoln Boulevard access, the greatest change would be experienced from Lincoln Boulevard at Hughes Terrace including the visibility of the proposed retaining wall as approached from the north. The new roadway would not be visible from most view locations along Lincoln Boulevard north and south of the intersection with Hughes Terrace. However, the tapered slopes on both sides of the new access road may be visible from the north depending on landscape vegetation used. This alteration of the east end slope is considered a locally adverse impact, but with implementation of the proposed revegetation and relatively unchanged distant views, impacts would not be significant.

Mitigation Measures

The habitat enhancement program specified in Section IV.D., Plant Life and Animal Life, would preserve and enhance the natural appearance of the project bluff face and as such aids in mitigating the project's impacts to aesthetics and views. In addition, the following mitigation measures are proposed to reduce project impacts:

1. Preservation of the open space lots (Lots 119 through 129 shall be established by covenant and agreement.

2. Residential Lots 1 through 26 shall be set back from the bluff edge a minimum of 15 feet from a 2:1 projection line up from Cabora Drive (as defined by the approved grading plan) in addition to the code required minimum building setback. With the exception of handrails on the bluff trail, fences shall be prohibited on the face of the bluff.

3. The materials used on the elevated section of the bluff trail shall be chosen to blend with the vegetation and match the coloration of the bluff.

4. Wherever possible, down drains shall be either underground systems, or, if at ground level, curved to present a more natural appearance.

5. A detailed landscaping plan and program for remaining open space areas shall be prepared by a qualified landscape architect and submitted to the Advisory Agency for review and approval.

6. The project shall include a trail system and a view park to allow individuals access to views of the plain below, and cityscape and mountains to the north of the project site.

7. All lighting shall be directed onto the site. Subject to the illumination provisions of the Uniform Building Code, "cut off" street lighting fixtures shall be used throughout to minimize the impact of views of, from, and over the site after dark to less than significance.

8. New telephone and power lines shall be placed underground and all existing above ground lines on the project site shall be replaced with underground lines.

9. A building height limit of 35 feet will be imposed by deed restriction, which is ten feet below the City requirement.

Environmental Impact After Mitigation

The project's significant view impacts would generally be reduced with implementation of the mitigation measures. After implementation of the mitigation measures, impacts to views associated with the new Lincoln Boulevard access would be reduced to below a significant level. However, even after mitigation measures are implemented development of the site would significantly impact views from some homes and public vantages south of the project site and from some areas north of the project site.

Cumulative Impact

The Playa Vista project is the only related project that would contribute cumulatively to affect the visual character of the project locale. The findings for Playa Vista (Tract No. 49104) indicate that the development would possibly reduce visual access to view resources, creating adverse, but less than significant impacts after project specific mitigation measures. Other related projects are sufficiently distant and/or in isolated viewsheds, such that they would not contribute cumulatively with the proposed project to aesthetic and view impacts. Given the evolving developed urban nature of the project locale, the cumulative impact on the views in the vicinity would result in adverse, but less than significant impacts to views and aesthetics.

IV. T. 1. ARCHAEOLOGICAL RESOURCES

Environmental Impact

The proposed project would develop an area where two significant archaeological sites are located. Project activities would include extensive grading and the construction of single-family residential units. Previously data recovery has mitigated the loss of information associated with these two sites. The proposed project, therefore, would not have a significant impact on archaeological resources.

Mitigation Measures

Pursuant to Part IX of Appendix K of the State CEQA Guidelines, accidental discoveries of human remains and unique archaeological resources will be mitigated as follows:

Discovery

1. Prior to earth disturbing activities, a non invasive map of potential cultural features shall be created through the use of remote sensing techniques. At a minimum, a sample of the anomalies identified through remote sensing will be tested through manual and/or mechanical excavation. A list of feature types and their probable location will then be generated. Feature types that meet CEQA criteria of "unique" or "important" will be identified and targeted for excavation.

2. Even with the remote sensing results, it is possible that additional cultural features will be discovered during grading and construction. All on-site grading operations shall be monitored by a professional archaeologist and Native American. The Native American monitor will be selected from a list of suitable candidates obtained from the Native American Heritage Commission. In the event of notification by the project archaeologist that a potentially significant or unique find has been unearthed, there shall be no further excavation or disturbance of the location until the geographic extent and scientific value of the resource can be reasonably verified.

Excavation

3. Feature types targeted for excavation include: caches, pit ovens and earth ovens. Another type, hearths, are common throughout southern California and shall be mapped, but not excavated unless there is demonstrated potential to yield data on site chronology or subsistence practices.

4. Any excavation of identified features shall be preformed manually using standard archaeological techniques. Excavations shall be conducted by professional archaeologist and monitored by an appropriate Native American monitor.

5. In the event that human remains and grave goods are discovered during the monitoring program, there shall be no further excavation or disturbance of the site where such remains are discovered, nor shall there be any disposition of such human remains and grave goods, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Excavation or disturbance may continue in other areas of the project site that are not reasonably suspected to overlie adjacent remains.

Reporting

6. All grading and construction plans shall be clearly imprinted with all the archaeological mitigation measures. All site workers shall be informed in writing by the on-site archaeologist of the restrictions regarding disturbance and removal as well as procedures to follow should a resource deposit be detected.

7. Upon completion of earth disturbing activities, the archaeological monitor shall prepare a report. The report shall include the results of the fieldwork and all appropriate laboratory and analytical studies that were performed in conjunction with feature excavation. The report shall be submitted in draft form to the City of Los Angeles. City representatives will have 30 days to comment on the report. All comments and concerns shall be addressed in a final report issued within 30 days of receipt of city comments.

Curation

8. All artifacts, notes, photographs, and other project-related materials recovered during the monitoring program shall be curated at a facility meeting federal and state standards.

Environmental Impact After Mitigation

The project's significant impacts on archaeological resources would be reduced to a less than significant level after implementation of the mitigation measures.

Cumulative Impact

The cumulative total of all related project development creates the potential for additional impacts upon archaeological resources. Although each project must develop adequate mitigation measures to substantially lessen or avoid impacts on an individual basis, the incidental loss of all project-study area archaeological resources may constitute a significant cumulative impact.

IV. T. 2. PALEONTOLOGICAL RESOURCES

Environmental Impact

Impacts involving the dune sand, which is located on the top of the bluffs and designated for residential development, would not be anticipated to be significant. However, Palos Verdes Sand is located in areas of the site which are proposed for fill, due to improvements to existing erosional features and a new road proposed at the eastern end of the project site. Though most grading activities would occur above the Palos Verdes Sand rock unit, potential for disturbance or destruction exists in some areas, particularly in the vicinity of the bluff face. The impacts to the Palos Verdes Sand would be potentially significant based on the scientific value of the deposits.

Mitigation Measures

To mitigate adverse and potentially significant project impacts, the following mitigation measures are recommended:

1. A qualified paleontologist shall be retained to perform a preconstruction salvage effort to salvage any significant exposed fossils.

2. A qualified palaeontologist shall be present on site during all excavations that encounter or are likely to encounter the Palos Verdes Sand. This paleontologist shall be able to divert, direct, or halt grading activities until all evaluation and salvage of exposed fossils is completed. Because of the potential for microvertebrate fossils during excavation within Palos Verdes Sand, the palaeontologist shall direct the collection of matrix samples for processing through fine meshed screens.

3. Grading into the dune/terrace deposits shall be monitored periodically: the duration of these visits shall depend on the rate of excavation and the abundance of fossils.

4. Prior to being deposited in the finial repository, all fossils shall be prepared to the point of identification, cataloged, and curated.

5. A final report shall be filed with the repository and the lead agency upon completion of all field and laboratory work.

Environmental Impact After Mitigation

The project's potentially significant impact upon paleontological resources would be reduced to a less than significant level after implementation of the mitigation measures.

Cumulative Impact

Projects on sites having fossiliferous deposits could contribute cumulatively to the loss of fossil remains, however, with the implementation of individual project mitigation measures, cumulative impacts to paleontological resources are anticipated to be less than significant.

II. Corrections and Additions to the Subsequent Draft EIR

II. CORRECTIONS AND ADDITIONS TO THE SUBSEQUENT DRAFT EIR

This section includes changes to the Subsequent Draft EIR which have resulted from the Lead Agency's review, in preparing the Subsequent Final EIR, of the comments submitted on the Subsequent Draft EIR by public agencies and interested individuals and groups. Revisions are presented in the order that the information was presented within the West Bluffs Project Subsequent Draft Environmental Impact Report.

I. SUMMARY

a. Make the following street name changes throughout this Section and the entire Subsequent Draft EIR:

- Manchester Boulevard to Manchester Avenue

  (Response 8-1)

- Park Hill Avenue to Park Hill Drive

  (Response 8-2)

b. Additional changes to the Summary Section are reflected in the updated text provided in Section I of the Subsequent Final EIR.

II. PROJECT DESCRIPTION

The project description has been revised to include minor project modifications which were presented to the City of Los Angeles on July 14, 1998 in response to community comments. The project description with revised text in ***italics*** is provided in Attachment II.A to this Correction and Additions Section.

(Responses 22-7, 31-5, 40-2, and 41-19)

III. ENVIRONMENTAL SETTING

[There are no corrections or additions to this section.]

IV. ENVIRONMENTAL IMPACT ANALYSIS

The project description, provided in Attachment II.A to this Correction and Additions Section, has been revised to include minor project modifications. These modifications include a reduction in the number of residential units from 120 to 119 dwelling units, an increase in open space, and variations to the pedestrian trail system. The impact of these minor modifications are minimal, and would very slightly reduce project impacts for most issues. Therefore, the environmental impact analysis in the Subsequent EIR may in some cases slightly overestimate project impacts.

A modified project description is provided (see Section II, above). The modifications presented have been reflected in O. Public Services, below, and in the Response to Comments portion of this Final EIR. Changes in the project grading program would require some additional excavation and export. Such changes have been reflected in A. Earth and B. Air, below, and in the Response to Comments portion of this Final EIR.

(Responses 22-7, 31-5, 40-2, and 41-19)

A. EARTH

a. Environmental Impact, the first sentence under b.(1) Grading should be revised to incorporate the modified grading program.

"Implementation of the proposed project would require a grading program to excavate (cut) an estimated 461,600 cubic yards of earth. Of this amount, 211,000 cubic yards of earth would be re-used to fill other portions of the project site. The remaining 250,000 cubic yards of material would need to be exported from the project site[1].

(Response 24-3 and 41-20)

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[1] *Amount of excavation and export may actually be less, based upon the revised October 1998 site plan.*

b. Mitigation Measures, page 83, revise the fourth full mitigation measure on the page to read as follows:

- The Applicant shall comply with the Best Management Practices for storm water quality. These practices shall be in compliance with Order No. 96-054, National Pollutant Discharge Elimination System (NPDES), Permit CAS614001 issued by the Regional Water Quality Control Board (RWQCB) to the County of Los Angeles and local agencies.

  (Response 3-1)

c. Mitigation Measures, page 83, add the following after the last mitigation measure.

The following mitigation measure has been added by the project applicant in order to minimize construction impacts:

- The applicant shall provide to all project construction contractors a copy of the Applicant's Required Construction Practices for the West Bluffs Project (see Appendix B of the Subsequent Final EIR). These practices shall be adhered to during project construction.

  (Responses 13-11, 14-17, 14-18, 25-8, 41-23, 47-5, 50-6, 54-6, 64-3)

B. AIR

Revisions to the project grading program are proposed as part of the he modified project (see Section II, above), which was presented to the City of Los Angeles in October of 1998 in response to community comments. The Air Quality analysis with revised text in ***italics*** is provided in Attachment II.B to this Correction and Additions Section.

(Responses 14-5, 22-7, 31-5, 36-2, 40-2, 41-19, 41-20, 50-2, 52-2, and 55-2)

C. WATER

1. Surface Water Runoff/Hydrology

a. Environmental Impact, page 122, fourth paragraph, the sentence reading "The energy dissipater, outfall pipe and headwall would be enlarged to

accommodate the increased discharge to the Ballona Wetlands" should be followed by the following sentence:

"Proposed enlargement of the existing headwall could result in very minor impacts to existing wetlands currently fed by water from the headwall (see Section IV.D, Plant Life/Animal Life). The volume of increased discharge would be very minor and would not have an adverse effect upon the Ballona Wetlands. Runoff contributions from the West Bluffs project site have already been taken into account in the design for the freshwater wetlands associated with the Playa Vista First Phase project.

(Response 1-3)

D. PLANT LIFE AND ANIMAL LIFE

a. Environmental Setting, page 136, second paragraph, second full sentence from the bottom of the page change "Careful field surveys by project botanists and wetland biologists revealed no characteristic topographic depressions or indicator plant species on-site." to read:

"Careful field surveys by project botanists and wetland biologists revealed the presence of a broad, defined topographic depression on the project site bluff top, but no indicator vernal pool plant species were observed in the vicinity."

(Responses 15-9, 34-6)

b. Environmental Impact, page 150, the second and final paragraph on the page should be followed by the following paragraph:

In addition, the project applicant is considering two storm drain improvement programs (see Section IV.C, Surface Water Runoff/Hydrology). One program, planned in the event that implementation of the Playa Vista project does not precede West Bluffs project implementation, would necessitate enlargement of a headwall associated with the existing Lincoln Boulevard storm drain. Headwall enlargement would result in very minor impacts to existing off-site

wetlands currently fed by water from the headwall. The current extent of the wetlands generated by the flow from the headwall is an area measuring approximately 22 feet in width and 110 feet in length. Construction of the new headwall would impact approximately half of this area, or 1,200 square feet (0.03 acres), and would represent a slight and less than significant impact upon biological resources. Even when added to the jurisdictional "waters" already impacted, the resulting impact is a less than significant project impact. Moreover, these impacts would not occur if the Playa Vista project is completed in a timely manner."

(Response 1-3)

c. Mitigation Measures, page 155, delete the following Mitigation Measure:

- Utility poles and lines shall be placed underground where practicable.

(Response 25-2)

E. ANIMAL LIFE

[There are no corrections or additions to this section.]

F. NOISE

[There are no corrections or additions to this section.]

G. LIGHT AND GLARE

[There are no corrections or additions to this section.]

H. LAND USE

a. Environmental Impact, page 197, first paragraph, add the following sentence after the second sentence:

"Approximately 11.95 acres of the project site fall within the California Coastal Zone Boundary."

(Response 17-3)

b. Environmental Impact, page 197, first paragraph, last sentence, change "...would create a net increase approximately 2.2 acres in the amount of project area that would be located within the Coastal Zone Boundary." to read:

"...would increase the amount of project area which falls within the Coastal Zone Boundary to approximately 14.32 acres, a net increase of approximately 2.37 acres."

(Response 17-3)

I. NATURAL RESOURCES

[There are no corrections or additions to this section.]

J. RISK OF UPSET/HUMAN HEALTH

[There are no corrections or additions to this section.]

K. POPULATION

[There are no corrections or additions to this section.]

L. POPULATION AND HOUSING

[There are no corrections or additions to this section.]

M. RIGHT OF WAY AND ACCESS

[There are no corrections or additions to this section.]

N. TRANSPORTATION AND CIRCULATION

a. Mitigation Measures, page 253, add the following Mitigation Measure:

- Construction-related traffic shall access the project site via "A" Street, whenever possible, once it is constructed. Further, construction vehicles shall park within the project site, whenever possible.

  (Responses 25-6, 41-23 and 50-6)

b. Mitigation Measures, page 253, add the following Mitigation Measure:

- The applicant is working with Caltrans in the design of the necessary roadway dedications and improvements along the Lincoln Boulevard frontage of the site.

  (Response 3-1)

O. PUBLIC SERVICES

a. Environmental Impact, page 290, Table 45 PROJECT OPEN SPACE, replace this table with the revised table on page II-8 of this Section II.

(Response 13-7)

b. Environmental Impact, page 290, second paragraph, the second sentence, change "...dedication of 1.01 acres of park/recreation elements." to read:

"...dedication of 1.96 acres of park/recreation elements."

(Response 13-7)

P. ENERGY CONSERVATION

[There are no corrections of additions to this section.]

Q. UTILITIES

a. Environmental Setting, page 338, Table 58 EXISTING MAJOR CLASS III LANDFILLS AVAILABLE TO THE CITY OF LOS ANGELES, replace this table with the revised table on page II-9 of this Section II.

Table 45

PROJECT OPEN SPACE

Open Space Element	Tentative Tract Lot No.	Project Acreage
View Park	Lot 125	0.32 acres
Pedestrian Trail [a]	Lots 120, 122, 125, 127, 128, and 130	1.64 acres
Park/Recreation Element Subtotal		**1.96 acres**
Other Open Space	Lots 121, 123, 124, 126, 129, and 131	15.37 acres
TOTAL		**17.33 acres**

[a] *Acreage includes entire lot area.*

Source: Planning Consultants Research and Robert Bein, William Frost & Associates, 1998.

(Response 5-1)

R. SAFETY

[There are no corrections or additions to this section.]

S. AESTHETICS AND VIEWS

a. Mitigation Measures, page 364, change the first mitigation measure "...open space lots (Lots 121 through 128)..." to read:

"...open space lots (Lots 120 through 131)..."

(Response 13-7)

b. Mitigation Measures, page 365, add the following Mitigation Measure:

- A building height limit of 35 feet will be imposed by deed restriction, which is ten feet below the City requirement.

(Responses 14-16, 31-9, 35-9, 35-10, 40-2, 41-2, 55-3)

Table 58

EXISTING MAJOR CLASS III LANDFILLS
AVAILABLE TO THE CITY OF LOS ANGELES
(millions of tons)

Site	Location	Owner/Operator	Annual Permitted Capacity	Annual Disposal [a]	Remaining Capacity [b]	Permit Exp. Date
Bradley	Sun Valley	Waste Management, Inc.	3.12 [c]	1.27	7.64	2006
Chiquita Canyon [d]	Valencia	Waste Management Inc.	1.56	0.46	23.00	2019
Lancaster	Lancaster	Waste Management, Inc.	0.31	0.19	0.47	2002
Sunshine Canyon	Sylmar	BFI, Inc.	2.10	1.25 [e]	16.90	Completion of Project [f]

[a] *Annual disposal of municipal solid waste is based on 1995 average daily waste quantities.*
[b] *Facility remaining permitted capacity (as of December 31, 1995).*
[c] *Reflects increase in permitted daily capacity, as of August 15, 1996. Source: Deana Nichols, Site Engineer, Waste Management, Inc., November 1, 1996.*
[d] *Data based on CUP No.89-0185. Source: Stacy Jordan, Civil Engineer Assistant, Environmental Programs Division, Los Angeles County Department of Public Works, December 16, 1997.*
[e] *Estimated annual disposal subject to change once stabilized operations are reached. Source: Jim Aidukas, Director of Environmental Affairs, BFI, Inc., November 1, 1996.*
[f] *Permit Expiration Date noted as Completion of Project per Telephone Communication with James Pena, Methane Systems Manager, BFI, Inc., August 1998.*

Note: In 1996, Lopez Canyon and BKK Landfills closed, Sunshine Canyon Landfill opened, and Azusa Landfill's waste discharge requirements allowing the disposal of non-inert solid waste were rescinded. These changes have caused the regional waste disposal patterns to shift significantly; thus, the 1995 Average Daily Disposal Rate may not reflect the current (January 1997) disposal patterns.

Source: Los Angeles County Department of Public Works, Environmental Programs Division, "Countywide Siting Element," June, 1997.

T. CULTURAL RESOURCES

[There are no corrections or additions to this section.]

V. CEQA MANDATED SECTIONS

[There are no corrections or additions to this section.]

VI. ALTERNATIVES

[There are no corrections or additions to this section.]

VII. MITIGATION MONITORING PROGRAM REQUIREMENTS

[There are no corrections or additions to the text of this section. A revised Mitigation Monitoring Program is included as Appendix A of this Subsequent Final EIR.]

VIII. ORGANIZATIONS AND PERSONS CONTACTED, REFERENCES

[There are no corrections or additions to this section.]

TECHNICAL APPENDICES:

VOLUME 1

A. MITIGATION MONITORING PROGRAM

a. A revised Mitigation Monitoring Program is included as Appendix A of this Subsequent Final EIR.

B. NOTICE OF PREPARATION/INITIAL STUDY/COMMENTS

[There are no corrections or additions to this section.]

C. GEOTECHNICAL REPORTS

[There are no corrections or additions to this section.]

VOLUME 2

D. AIR QUALITY DATA

Revisions to this Technical Appendix are contained in Appendix C of this Subsequent Final EIR. See also Attachment II.B.

E. HYDROLOGY REPORT

[There are no corrections or additions to this section.]

F. BIOLOGICAL RESOURCES REPORTS

[There are no corrections or additions to this section.]

G. NOISE ANALYSIS DATA

[There are no corrections or additions to this section.]

H. TRAFFIC REPORT

[There are no corrections or additions to this section.]

I. CUMULATIVE IMPACT CALCULATIONS FOR PUBLIC SERVICES, ENERGY CONSERVATION, AND UTILITIES

[There are no corrections or additions to this section.]

J. ARCHAEOLOGICAL RESOURCES REPORT

[There are no corrections or additions to this section.]

K. PALEONTOLOGICAL RESOURCES REPORT

[There are no corrections or additions to this section.]

ATTACHMENT II.A MODIFIED PROJECT DESCRIPTION

After distribution of the Subsequent Draft EIR, the applicant presented minor project modifications to the City of Los Angeles in October 1998 in response to community concerns. These modifications are indicated in ***italics***.

1. LOCATION AND BOUNDARIES

a. Location

Catellus Residential Group, the project applicant, proposes to develop the West Bluffs project, a ***119***-home subdivision (Tentative Tract Map No. 51122) on a 44 net-acre vacant site[1] in the Playa del Rey area of the City of Los Angeles. As shown in Figure II.A.1 on page II.A-2, the site is approximately 1.25 miles from the Pacific Ocean, about 0.5 mile south of Marina del Rey, about 2.3 miles west of the City of Culver City, and approximately 2 miles north of the Los Angeles International Airport (LAX).

The east portion of the site is adjacent to Lincoln Boulevard (State Route 1) and the southern site boundary faces an existing single-family residential community which includes the 7300 block of 81st Street, the 8000 block of Rayford Drive, and the 7400 and 7500 blocks of 80th Street. The northern boundary of the site is roughly demarcated by Cabora Drive, a service road located along the Westchester/Playa del Rey Bluffs (also know as the Ballona Escarpment or Marina Bluffs), which overlook Ballona Wetlands.

b. Regulatory Boundaries

Several notable regulatory boundaries affect the project site. The entire site falls within the boundaries of the Westchester/Playa del Rey Community Plan and the Coastal Bluffs Specific Plan. In addition, the bluff face falls within the California Coastal Zone with the lower portion of the bluff face within the Playa Vista Area B Specific Plan.

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[1] *As streets adjacent to the project site are already constructed, the net project area (44 net-acres) is used throughout this EIR, unless otherwise noted. The net acreage is **44.69** but is rounded to 44 for general discussion purposes.*



Source: Planning Consultants Research, 1997

N

0 1 Mile

Figure II.A.1
Project Location Map

The eastern boundary of adjacent Tract No. 9167 also crosses the proposed project site in a north/south direction along the western portion of the project site. This residential subdivision received its entitlements in 1930, and a portion of this tract (4.9 acres) would be re-subdivided as part of the proposed project.

2. HISTORY OF PROJECT

An earlier design for a 121 single-family home subdivision was previously proposed on the project site in the early 1990s. The Draft and Final EIRs for that proposal were approved by City environmental review staff in November 1993 and June 1994, respectively.[2] Design revisions were then desired by the previous project applicant, but never formally submitted. Consequently, the project was not scheduled for public hearing and the Final EIR was never certified by the City. Catellus Residential Group is now proposing to implement the project with revisions which respond both to City of Los Angeles Engineering requirements relative to bluff stability and to community concerns regarding the appearance and preservation of the bluff and to neighborhood traffic impacts. Responding to concerns about the bluff face, that portion of the project is now designed to maintain a natural appearance. In response to public review comments regarding project traffic impacts on neighborhood residential streets, the project has been modified to internalize the street system such that no direct vehicle access to 80th Street, 79th Street, or to the residential area to the south would be available from the internal street system within the development. Only the ***29*** homes which face Rayford Drive and 80th Street would have direct access to the existing residential neighborhood. The proposed project provides pedestrian links between 80th Street, Berger Avenue, the project site and the bluff face. Several open space lots will be formed and two existing residential lots on Berger Avenue (Lots 3 and 4, Block 14, Tract 9167) would be dedicated as open space. The following paragraphs summarize the environmental process to date:

- **Environmental Assessment Form (EAF)** - The previous project applicant submitted an EAF for the proposed development on December 18, 1991. After review of the information, the Environmental Staff Advisory Committee (ESAC) on December 31, 1991 determined the proposed project may have a significant impact on the environment and directed that an EIR be prepared to address potential impacts. On

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2 *"Draft Environmental Impact Report, Tentative Tract No. 51122," EIR No. 91-0675-SUB(CDP)(PP), State Clearinghouse No. 92041046, November 1993; and "Final Environmental Impact Report, Tentative Tract No. 51122," EIR No. 91-0675-SUB(CDP)(PP), State Clearinghouse No. 920461046, June 1994. These document are hereby incorporated by reference into this Subsequent EIR. These documents are on file with the City of Los Angeles Department of City Planning.*

January 14, 1992, ESAC notified the applicant that the following issues must be included in the EIR analysis: earth (grading, drainage, and geologic hazards); animal life and riparian habitat; transportation, circulation, driveway/access; noise (LAX north runway); energy conservation; water conservation; public services; service systems (storm drainage, sewers, solid waste and disposal); archaeological resources; and aesthetics and views.

- **Notice of Preparation (NOP)** - The NOP circulation process was initiated in which responsible agencies and interested parties were invited to submit comments between April 2, 1992 and May 4, 1992 regarding potential impacts of the proposed project. Letters received in response to this notification suggested that in addition to the issues required by ESAC, the EIR should also include analysis of: air quality (stationary and mobile); plant life; land use; population and housing; paleontological resources; natural resources; risk-of-upset; right-of-way; safety; and utilities.

- **Public Meeting** - On June 16, 1992, a public meeting was held at which neighbors adjacent to the proposed project were invited to comment on the relevant environmental issues, which should be discussed in the Draft EIR. The issues that were raised were consistent with previously raised issues and focused on traffic and density-related impacts.

- **Draft EIR** - The Draft EIR was circulated for public review for 46 days (December 2, 1993 to January 18, 1994). Draft EIR availability was published in the Los Angeles Times on December 2, 1993. The Notice of Completion (NOC) was filed on December 2, 1993 with the State Secretary of Resources. Pursuant to Public Resources Code Section 21092.3, a copy of the NOC was posted with the Los Angeles County Clerk.

- **Final EIR** - The Final EIR was completed in June 1994, and approved by the City Planning staff. The project applicant then proposed to revise the project. A public hearing was never held and the Final EIR was not certified.

This Subsequent EIR has been prepared to address the revised project with regard to potential modifications in environmental impact. The preparation of a Subsequent EIR is permitted by the California Environmental Quality Act (CEQA) and Guidelines (CEQA Guidelines) in response to changed circumstances and new information without requiring that the environmental review process begin completely anew. Based upon an evaluation of the current project proposal and the previous environmental documentation, it has been concluded that all the environmental issues which were addressed in the Draft EIR ***were*** also addressed in this Subsequent EIR: Earth (Grading/Seismicity), Water (Surface Water Runoff/Hydrology), Plant and Animal Life, Air Quality (Mobile: construction-related and operational), Noise (Mobile:

construction-related), Land Use, Population and Housing, Transportation and Circulation (Traffic and Access), Public Services, Energy Conservation, Utilities (Water Conservation), Aesthetics and Views, and Cultural Resources (Archaeological and Paleontological).

Public circulation of the Subsequent Draft EIR began on May 21, 1998 and officially ended on July 6, 1998, lasting two days beyond the required 45-day review period. Comment letters were accepted up to July 13, 1998, providing a total of 54 calender days for public review and comment. Subsequent Draft EIR availability was published in the Los Angeles Times on May 21, 1998. The NOC was filed on May 21, 1998 with the State Secretary of Resources. Pursuant to Public Resources Code Section 21092.3, a copy of the NOC was posted with the Los Angeles County Clerk.

After distribution of the Subsequent Draft EIR, the applicant submitted minor modifications to the Tentative Tract Map 51122. These modifications were designed to increase the amount of dedicated open space, improve the proposed pedestrian trail system, and reduce the total number of residential lots from 120 to 118.

Numerous meetings have been held between the project applicant and the community to receive comments on the proposed project. These meetings began in May 1997 and have been on-going through the EIR process. The design of the project originally proposed in the Subsequent Draft EIR and the recent minor modifications to the project have incorporated many of the comments received in these meetings.

3. STATEMENT OF OBJECTIVES

The applicant has cited the following objectives as providing the foundation of planning and design program for the proposed project:

- To provide housing on the property in compliance with allowable densities established by the City of Los Angeles General Plan Land Use Element and municipal zoning ordinance regulations.

- To develop the property in compliance with all applicable provisions of the City of Los Angeles General Plan and each of its Elements, the Westchester-Playa del Rey District Plan and the Coastal Bluffs Specific Plan.

- To restore the bluff face within the project site in order to: (1) improve the safety of the project site through a limited corrective grading and bluff restoration program; (2) maintain and enhance the biological resource value of the bluff face through re-

vegetation with species that naturally occur in comparable local settings; (3) maintain and enhance bluff face aesthetics; and (4) reduce the amount of sediments being eroded into the Ballona Wetlands.

- To provide a passive, neighborhood accessible open space (viewpark) overlooking the bluffs and Ballona Wetlands with a pedestrian system of sidewalks and trails connecting the existing neighborhood to the project, to the bluff face and down the bluff face.

- To consistently complete the neighborhood setting on 80th Street and Rayford Drive by siting homes with front yards along these streets.

- To improve automobile circulation conditions in the adjoining neighborhoods relative to existing conditions and the previous project proposal on the project site.

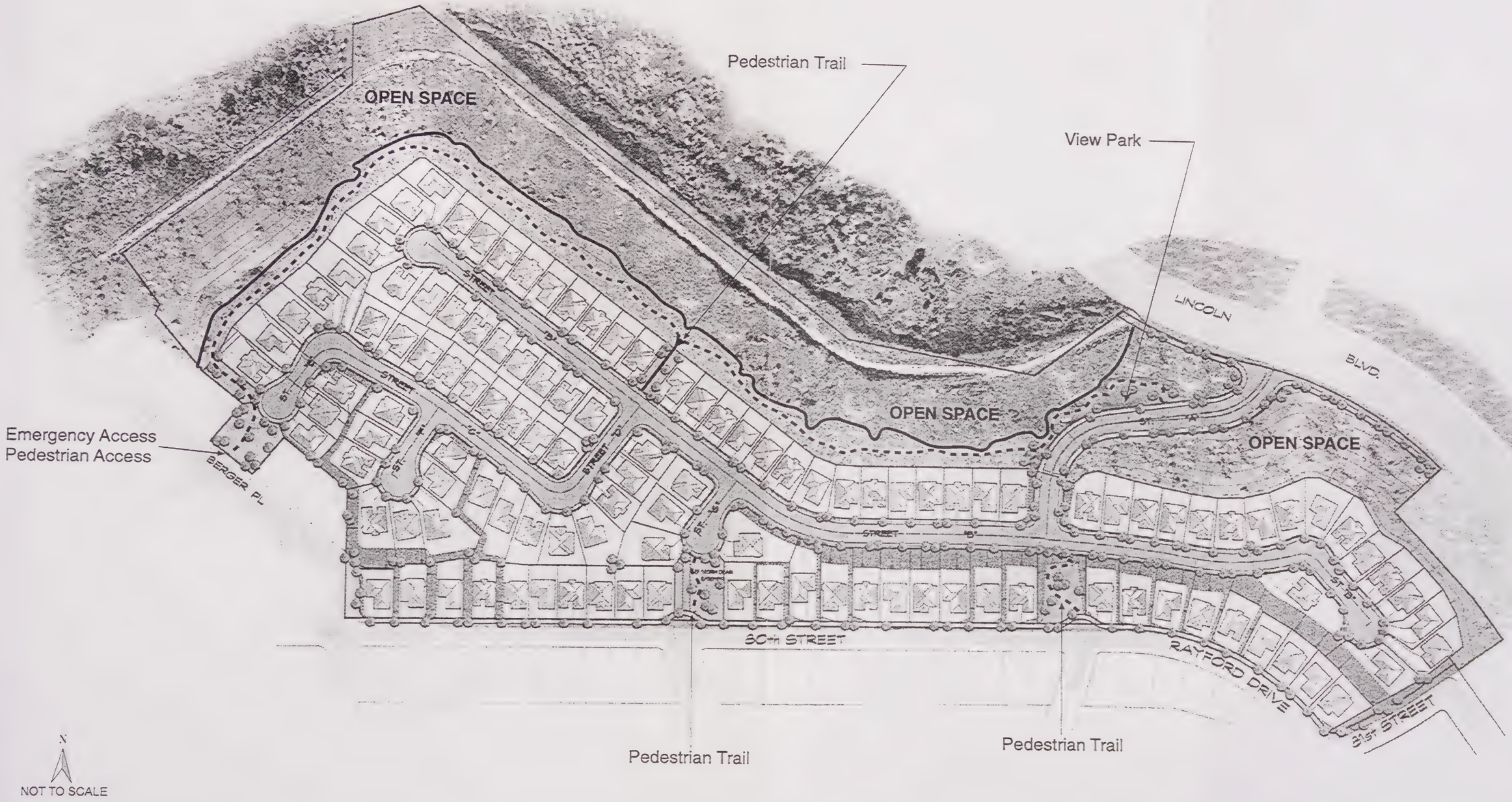
4. PROJECT CHARACTERISTICS

a. Project Design

The proposed project would subdivide the 44-acre site into ***119*** single-family residential lots, ***twelve*** open space lots, and streets. The project previously proposed ***in 1994*** included 121 single-family residential lots, one small park lot, streets and two open space lots. The features and site plan for the proposed project are shown in the illustrative site plan and tentative tract map in Figure II.A.2 on page II.A-7 and Figure II.A.3 on page II.A-8, respectively. In addition, the previous project site plan is included in Figure II.A.4 on page II.A-9. The land areas for the proposed project are identified in Table II.A.1 on page II.A-10. As indicated, the major portion of the development, the residential lots, would occupy approximately ***21.07*** acres, or approximately ***47*** percent of the project site. This would yield a net project density of approximately 5.6 dwelling units per acre. This is less than the existing net density for the adjacent neighborhood of 7.7 dwelling units per acre, and the allowable gross density of 7 dwelling units per gross acre for the majority of the site and a maximum of 24 dwelling units per gross acre for the portion of the site fronting Lincoln Boulevard.[3] Lots under the proposed project would range in size from approximately 5,800 to 23,000 sq.ft. with an average of about 8,000 sq.ft.

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[3] *Existing net densities for the surrounding neighborhood were determined from aerial photographs and Tract Map Nos. 9167, 9578, 9671, and 10501. The allowable densities are pursuant to the Westchester/Playa del Rey Community Plan. Per Robert Bein, William Frost & Associates, December 15, 1997.*



SOURCE: Robert Bein, William Frost & Associates

PCR

Figure II.A.2
Illustrative Site Plan



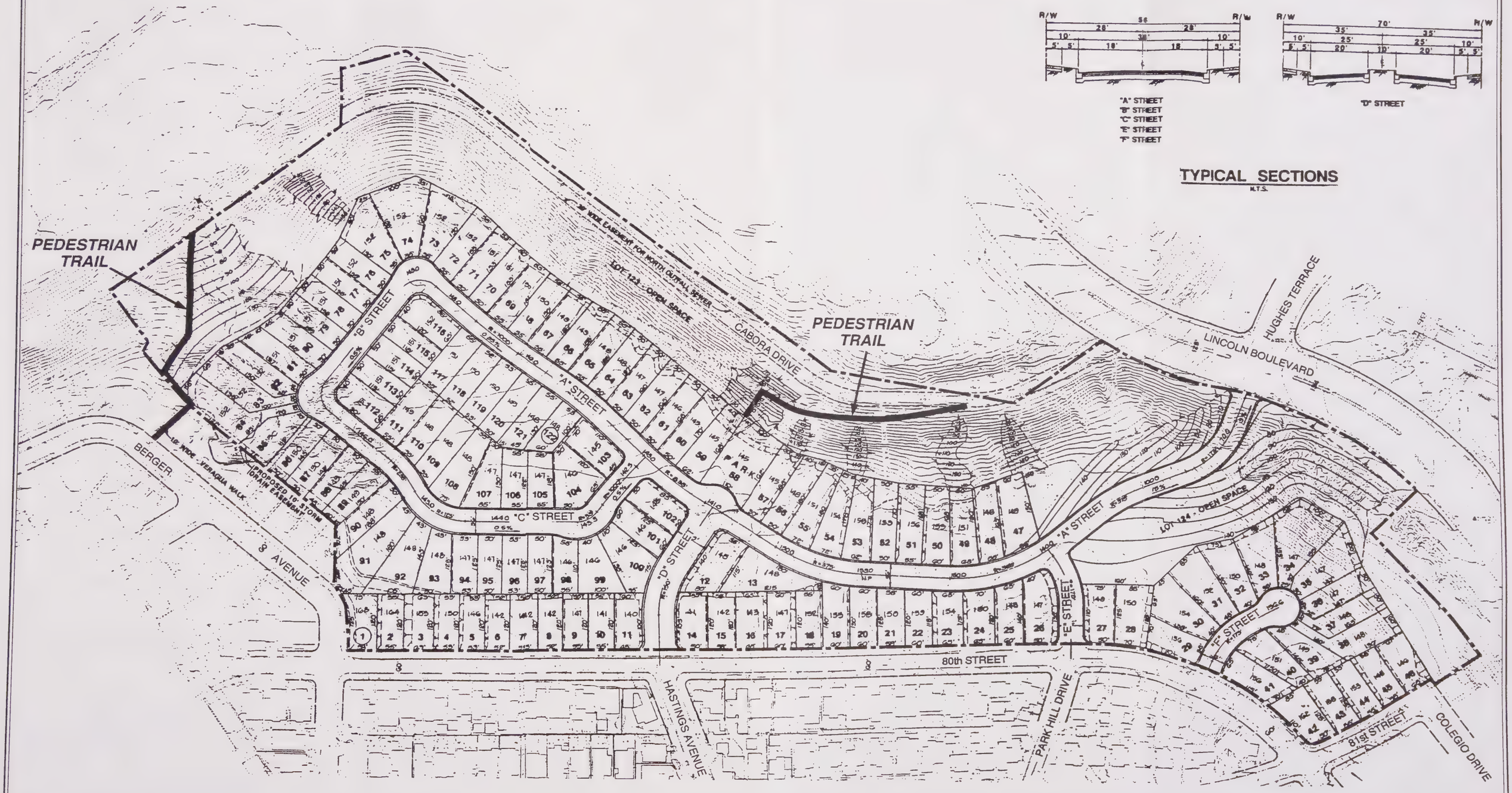
SOURCE: Robert Bein, William Frost & Associates

PCR

N

NOT TO SCALE

Figure II.A.3
Tentative Tract Map No. 51122



SOURCE: Psomas and Associates

PCR

N

0 300 Feet

Figure II.A.4
Previous Project Site Plan

CITY OF LOS ANGELES
CALIFORNIA

DEPARTMENT OF
CITY PLANNING
221 N. FIGUEROA STREET
LOS ANGELES, CA 90012-2601

CITY PLANNING
COMMISSION

PETER M. WEIL
PRESIDENT
ROBERT L. SCOTT
VICE-PRESIDENT
MARNA SCHNABEL
NICHOLAS H. STONNINGTON
ANTHONY N.R. ZAMORA

COMMISSION
EXECUTIVE ASSISTANT
(213) 580-5234

RICHARD J. RIORDAN
MAYOR

EXECUTIVE OFFICES
16TH FLOOR
CON HOWE
DIRECTOR
(213) 580-1160
FRANKLIN P. EBERHARD
DEPUTY DIRECTOR
(213) 580-1163
GORDON B. HAMILTON
DEPUTY DIRECTOR
(213) 580-1165
ROBERT H. SUTTON
DEPUTY DIRECTOR
(213) 580-1167

FAX: (213) 580-1176

INFORMATION
(213) 580-1172

October 27, 1998

FINAL ENVIRONMENTAL IMPACT REPORT NO.: 91-0675-SUB(CDP)(PP)(ZBA)

Project Location or Short Title: West Bluffs

State Clearinghouse No.: 97111005

The final report on the above-indicated case has been completed and is enclosed for your information since you are on record as having requested a copy and/or having submitted comments on the Draft EIR, which was circulated earlier. The Final EIR consists of the enclosed report together with the previously issued DEIR.

To determine the date and time that the pertinent project will be considered by the decision-making body, please call the appropriate office from among the following:

Commission Secretary . . .	(213)580-5223	(All CPC Cases - ZC, SUD, CUC suffixes)
Advisory Agency	(213)580-5544	(Tentative Tract Maps - SUB suffixes)
Zoning Administrator . . .	(213)580-5495	(All ZA Cases - ZV, CUZ suffixes)
Public Counter	(213)485-7826	(To obtain CPC or ZA Case No. for the above project)

CON HOWE
Director of Planning

for

DARRYL L. FISHER
Associate Zoning Administrator
Environmental Review Section

cc: Planning Coordinator
Council District No. 6

Enclosure: Final Report

CP-1263 (5/96)

Table II.A.1

SUMMARY OF PROPOSED SITE LAND USES

Use	Number of Lots	Area (acres)	Percent of Site
Single-family Dwellings	*119*	*21.07*	*47*
Open Space (including trail)	*12*	*17.33*	*39*
Streets	---	*6.29*	14
Total	*131*	*44.69*	**100**

(1) Housing Design Characteristics

Specific home designs have not been prepared at this time, however the proposed project will be designed to be compatible with the surrounding community. Homes would generally consist of two-story, four- and five-bedroom single-family dwelling units, designed in the "California Coastal" architectural style, which includes stucco exteriors and concrete tile roofing. Architectural details of the homes would incorporate varying elevations and colors, with building heights up to 30 feet. ***A building height limit of 35 feet would be imposed by deed restriction, which will apply to any future modifications of the homes.*** The homes would be compatible with, or complementary to, the styles of existing homes in the area. Units would range in size from 2,900 to 4,500 sq.ft. The project is expected to accommodate roughly *317* residents, assuming an average of 2.67 residents per unit, a ratio based on Census Tract information for the surrounding area.[4]

(2) Open Space Features

Open space would comprise approximately *17.33* acres (*39* percent) of the project site. While the park that was proposed under the previous *1994* project would not be included under the *current* project, the revised design includes ***in total 1.33 acres more park/recreational area (including trails) than the previous project*** (see Figure II.A.2 on page II.A-7). The previously planned park was eliminated because of: (1) community concerns regarding the perceived potential increase in crime that could be associated with the park; and (2) City objections to owning and maintaining a park of this size, which would only serve a small percentage of the City population. The current proposed open space would be distributed as follows: (1) on the eastern

[4] *The ratio of 2.67 persons per household was based on a sampling of Census data on household size for six single-family blocks in the immediate vicinity of the project site (Census Tract 2766.01).*

edge of the site which would include a sloping hillside area and a small view park (a passive recreation area with benches and walkways overlooking the wetlands), along "A" Street and Lincoln Boulevard; (2) on the bluff face and an area at the top of the bluff overlooking the Ballona Wetlands below, from Lincoln Boulevard to the west end of the site; and (3) along a pedestrian trail system ***(Lot 122), which begins at the terminus of "D" Street along the bluff top and extends to "A" Street. The pedestrian trail system also includes several pedestrian linkages to the surrounding neighborhood, including Lots 127, 128, and 130, each which provide a minimum of 100-foot wide open space. Proposed open space Lot 130 provides access to the bluff top trail at the westerly end of the project. Proposed open space Lot 130 replaces two existing lots (Lots 3 and 4, Block 14, Trail 9167) that are currently zoned residential. In addition, open space Lot 129 has been added along 81st Street to act as a proposed landscape buffer between the existing homes on 81st Street and Colegio Drive and the project.***

The proposed open space along the eastern edge of the site would serve as a buffer between Lincoln Boulevard and the proposed residential lots at the eastern end of "B" Street. These areas would include slope stabilization and would receive new native landscaping. This area would also include a small view park or passive recreation area which would link the project pedestrian trail system.

The second open space area which includes the bluff face overlooking Ballona Wetlands would be revegetated and enhanced with native plant material. The large erosional feature at the west end of the site (locally referred to as Hastings Canyon) would be filled in and receive new vegetation (native material).

The proposed pedestrian trail system includes a trail ***from open space Lot 130 on Berger Avenue at 79th Street along the bluff top and down "A" Street to Cabora Drive and the wetlands below, as shown in Figure II.A.2 on page II.A-7.*** This trail would be constructed of asphalt, approximately six feet wide, and include enhanced native landscaping where applicable. ***Behind Lots 45 through 50, the trail would need to be cut into the proposed Hastings Canyon fill slope. The trail on the fill slope would need to be located between 6 and 12 feet below the top of the slope and may require retaining walls between 5 and 8 feet in height.***

The remaining open space lots ***(Lots 120, 127, 128, and 130)*** and sidewalks that would be located throughout the development would serve as pedestrian corridors to connect the existing residential uses to the trail system within the proposed development. These open space areas would include enhanced landscaping features such as grass, shrubs and trees, where applicable. As shown in Figure II.A.2 on page II.A-7, these open space lots are located along the southern

boundary of the project at 80th Street and Hastings Avenue, and Rayford Drive and Park Hill Drive. Additional pedestrian access is provided via an emergency access easement between the "E" Street cul-de-sac and Berger Avenue.

(3) Slope Stabilization

Under the previous project, approximately 300,000 cubic yards of earth would ***have been*** moved. As the amount of excavated soil would have been equivalent to the amount of soil redistributed on the site as fill, no import or export of grading material was anticipated. In order to make the project more environmentally sensitive, revisions to the grading and bluff stabilization programs are now proposed. Preservation of the majority of the existing bluff face, excluding repairs to several existing erosional features for geotechnical safety, is proposed as part of the development. The larger erosional feature at the west end of the project site (commonly referred to as Hastings Canyon) would be filled with conventional grading techniques and finished slopes. Four of the smaller erosional features are proposed to be fitted with pile supported erosion control structures to limit further erosion in these locations. Slopes over three feet in height would be landscaped with trees and shrubs and include irrigation. The revised grading and stabilization requirements include setting the home sites further away from the current edge of the bluffs to comply with geotechnical safety requirements. As such, the current design indicates an approximate cut quantity of ***461,000*** cubic yards. Approximately ***250,000*** cubic yards of the total proposed cut would be required to be exported off the project site. Based upon the modified grading design and project layout, preliminary drainage plans have been prepared for the current project.

(4) Circulation and Access

Circulation and access designs have also been revised over the previous project. As shown on Figure II.A.4 on page II.A-9, the previous project was proposed to be served by a network of interior streets consisting of the following:

- A exiting/central street ("A" Street) connecting directly to Lincoln Boulevard at Hughes Terrace and to a loop (formed by "B" and "C" Streets) serving the western end of the site.

- Two connector segments to 80th Street at Hastings Avenue ("D" Street) and Park Hill Drive ("E" Street).

- A cul-de-sac ("F" Street) from 80th Street at the eastern end of the site.

Under the revised project, the street system has been modified such that only ***29*** homes would have direct access to 80th Street, Rayford Drive, and the residential community to the south (see Figures II.A.2 and II.A.3, on pages II.A-7 and II.A-8, respectively), reducing neighborhood cut-through traffic over the previously proposed project. Implementation of the proposed project would still include an entry way and central street ("A" Street) connecting directly to Lincoln Boulevard at Hughes Terrace. "A" Street would link with "B" Street, which would link with the remaining streets in the proposed development. The internal street system comprises six acres, or approximately 14 percent of the project site. Modifications have been made to the proposed project such that no direct access to 80th Street and to the residential area to the south would be available from the internal street system and the remaining 89 homes within the development.

Additional emergency access service would be provided for Police and Fire Department vehicles via an access route between the internal roadway system and Berger Avenue. The emergency access easement would be located between the terminus of the "E" Street cul-de-sac and Berger Avenue, would be gated and restricted by easement to prevent non-emergency vehicle use, and would be developed in accordance with City design standards.

b. Changes in Regulations and Plans

Subsequent to the publication of the Final EIR, some regulatory changes have occurred which would now need to be addressed with regard to the redesigned project. Plans and polices that have changed include the following:

- South Coast Air Quality Management District (SCAQMD) recently adopted the 1997 Air Quality Management Plan (AQMP) for the South Coast Air Basin.
- Coastal Bluffs Specific Plan has been adopted, replacing Interim Control Ordinance No. 168836.
- Southern California Association of Governments (SCAG) adopted the 1995 Regional Comprehensive Plan and Guide.
- Recent changes and classifications regarding federal and state sensitive species lists.

The environmental analysis included in Section IV ***of the Subsequent Draft EIR***, addresses these regulatory changes with regard to the proposed project.

5. DISCRETIONARY REVIEW

In order to implement the proposed project, discretionary approvals may include, but not be limited, to the following:

- Tentative Tract Map approval - City of Los Angeles
- Coastal Development Permit - City of Los Angeles and California Coastal Commission
- Zoning Administrator Interpretation for front yard setback modification on various lots - City of Los Angeles
- Resource Agency Permits - U.S. Army Corps of Engineers; California Department of Fish and Game, and California Regional Water Quality Control Board
- Grading Permit - City of Los Angeles
- Disposal Site/Haul Route Permit - City of Los Angeles
- Caltrans Encroachment Permit - Caltrans
- "B" Permit for Water, Sewer, Storm Drain, Street and Encroachment Permits - City of Los Angeles
- Building Permits - City of Los Angeles
- Lot Line Adjustment/Merger of Lots - City of Los Angeles
- ***Minor Area Variance - City of Los Angeles***
- ***Hastings Avenue Vacation/Merger***

In addition to the above, project-related impacts with regard to storm water runoff will fall under Order No. 96-054, National Pollutant Discharge Elimination System Permit CAS614001, which is issued by the California Regional Water Quality Control Board.

6. SCHEDULE

Site work is scheduled to begin in as early as late 1998/early 1999. Project development would be implemented over a two and a half to three year period with an anticipated completion date in 2002.

ATTACHMENT
II.B. MODIFIED AIR QUALITY ANALYSIS

This analysis summarizes the findings and conclusions of the air quality technical data for the proposed project prepared *in* January 1998 ***and updated in October 1998*** by Planning Consultants Research. This technical report describes the existing air quality environment and analyzes the potential air quality impacts of the West Bluffs project ***including the revised grading program for the October 1998 modified project***. The technical data ***for regional emissions are*** included in Appendix D of ***the*** Subsequent EIR ***and supplemental updated technical data for construction are included in Appendix C of this Subsequent Final EIR***.

1. ENVIRONMENTAL SETTING

a. Regulatory Setting

In response to longstanding concerns about air pollution, federal, state and local authorities have adopted various rules and regulations requiring evaluation of the impact on air quality of a planned project and appropriate mitigation for air pollutant emissions. The following sections focus on current air quality planning efforts, and the responsibilities of agencies involved in these efforts. A discussion of ambient air quality standards is also provided.

A number of plans and policies have been adopted which address air quality concerns. Plans and policies relevant to the proposed project are discussed below.

(1) Federal Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977 and 1990). The CAA establishes national air quality standards, known as National Ambient Air Quality Standards (NAAQS) and specifies future dates for achieving compliance. The CAA also mandates that the state submit and implement the State Implementation Plan (SIP) for local areas not meeting these standards. These plans must include pollution control means that demonstrate how the standards will be met. The City of Los Angeles is included in the South Coast Air Basin (Basin), which was designated a non-attainment area for certain pollutants that are regulated under the CAA. By a separate state statute, the South Coast Air Quality Management District (SCAQMD) was

established as the local air pollution control agency for the Basin. The NAAQSs were amended in July 1997 to include an additional standard for ozone, and to adopt a NAAQS for fine particulates ($PM_{2.5}$).

The 1990 Amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS, requires both a demonstration of reasonable further progress toward attainment and incorporates additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA which would most substantially affect the development of the proposed project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants: (1) ozone; (2) nitrogen dioxide (NO_2); (3) sulfur dioxide (SO_2); (4) coarse particulates (PM_{10}); (5) carbon monoxide (CO); and (6) lead (Pb). The CAA sets certain deadlines for meeting the NAAQS within the Basin including: (1) ozone by the year 2010; (2) PM_{10} by the year 2006; and (3) CO by the year 2000.

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require use of cleaner burning gasoline, and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and nitrogen oxides (NO_x).[1]

(2) California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. Air pollution from commercial and industrial facilities is regulated by local air quality management districts. All air pollution control districts have been formally designated as attainment or nonattainment for each California air quality standard. Nonattainment designations are categorized into three levels of severity: (1) moderate, (2) serious, and (3) severe.

The Basin, in which the project site is located, is designated as ***an "extreme"*** nonattainment area for ozone ***and a "serious" nonattainment area for CO and PM_{10}. "Serious" or worse*** nonattainment areas are required to prepare air quality management plans to include

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[1] *NO_x is a collective term which includes all forms of nitrogen oxides (NO, NO_2, NO_3) which are emitted as by-products of the combustion process. However, since most of these chemicals eventually convert to NO_2 in the atmosphere, all NO_x emissions are conservatively reported as the criteria pollutant NO_x.*

specified emission reduction strategies in an effort to meet clean air goals. The requirements include:

- Application of Best Available Retrofit Control Technology to existing sources;
- Developing control programs for area sources (e.g., architectural coatings and solvents), and indirect sources (e.g., motor vehicle use generated by residential and commercial development);
- A district permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures, and assuring a substantial reduction in the growth rate of vehicle trips and miles traveled;
- Significant use of low-emission vehicles by fleet operators;
- Sufficient control strategies to achieve a 5 percent or more annual reduction in emissions (or 15 percent or more in a three-year period) for reactive organic compounds (ROC)[2], NO_x, CO and PM_{10}. However, air basins may use an alternative emission reduction strategy which achieves a reduction of less than 5 percent per year under certain circumstances; and
- Demonstrating compliance with California Air Resources Board's established reporting periods for compliance with air quality goals. A seven-year initial reporting period from January 1, 1988 to December 31, 1994, was established. Subsequent reporting periods occur every three years (i.e., 1997, 2000, etc.). The 1991 Air Quality Management Plan (AQMP) sought to achieve a 35 percent emissions reduction for the initial three year period, followed by 15 percent reduction in emissions within each subsequent three year period.

(3) South Coast Air Quality Management District

SCAQMD has jurisdiction over approximately 12,000 square miles consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what used to be, under state classification, the Southeast Desert Air Basin. While air quality in this area has

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[2] *Reactive Organic Compounds (ROC) are hydrocarbon emissions which combine with other atmospheric chemicals in the presence of sunlight to produce ozone, which is identified as a criteria pollutant. Since ozone is produced through this secondary reaction process, monitoring and regulation relative to ozone is actually accomplished through the monitoring and regulation of "ozone precursors" (i.e., ROC).*

improved, with 1996 (the latest year for which comprehensive data are available) registering some of the lowest levels of air pollutant concentrations in decades, the Basin requires continued diligence to meet air quality standards. The SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the California and national standards. The most recent version of the AQMP was adopted in 1997. Portions of the AQMP that are required to meet federal CAA requirements have been submitted to the U.S. Environmental Protection Agency (U.S. EPA) and therefore will become federally enforceable upon U.S. EPA approval. The 1997 revision describes a comprehensive air pollution control program focused on attaining the California and national ambient air quality standards in the Basin, and those portions of the Southeast Desert Air Basin that are under the jurisdiction of the SCAQMD. In relation to earlier plans, the 1997 revision places greater emphasis on the most highly effective controls and regulations, rather than a breadth of controls on smaller sources such as land uses. It focuses more on particulate emissions that result from incomplete fuel combustion than previous plans, recognizing recent research on particulates and health effects. Notwithstanding, the 1997 AQMP still calls for the implementation of all feasible control measures and the advancement and use of technologies for which breakthroughs are on the horizon.

In addition to the AQMP and its rules and regulations, SCAQMD has published a handbook (CEQA Air Quality Handbook, most recent version: November, 1993) intended to provide local governments and CEQA practitioners with guidance for analyzing and mitigating project specific air quality impacts. This handbook provides standards, methodologies and procedures for conducting air quality analysis in EIRs.

(4) Regional Comprehensive Plan and Guide

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and serves as a forum for regional issues relating to transportation, the economy and community development and the environment. SCAG serves as the federally-designated metropolitan planning organization (MPO) for the southern California region and is the largest MPO in the United States. With respect to air quality planning, SCAG has prepared the Regional Comprehensive Plan and Guide (RCPG) for the SCAG region, which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation control portions of the Air Quality Management Plan and are utilized in the preparation of air quality forecasts included in the AQMP.

b. Existing Air Quality

(1) Regional Air Quality

As stated above, the project site is located within the South Coast Air Basin (Basin) of California, a 6,600 square-mile area encompassing all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The distinctive climate of this area is determined primarily by its terrain and geographical location. Regional meteorology is largely dominated by a persistent high pressure area which commonly resides over the eastern Pacific Ocean. Seasonal variations in the strength and position of this pressure cell cause changes in the weather patterns of the area. Local climatic conditions are characterized by warm summers, mild winters, infrequent rainfall, moderate daytime on-shore breezes, and moderate humidity. This normally mild climatic condition is occasionally interrupted by periods of hot weather, winter storms, and Santa Ana winds.

The Basin is an area of high air pollution potential, particularly from June through September. The poor ventilation is generally attributed to light winds and shallow vertical mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season and time of day. Ozone concentrations for example tend to be lower along the coast, higher in the near inland valleys and lower in the far inland areas of the Basin and adjacent desert.

Significant progress has been made in reducing air pollutant concentrations over the past decades in the Basin. Between 1976 and 1996, the number of days that the national standard for ozone was exceeded decreased by over 60 percent. Reductions in concentrations of other criteria pollutants show similar downward trends; however, ozone levels in this region are still the worst in the nation.

(2) Local Area Conditions

(a) Ambient Air Quality Standards

Over the past several decades, both California and the federal government have set and periodically revised ambient air quality standards for pollutants that are of the greatest health concerns. These standards encompass the most common varieties of airborne materials which can pose a health hazard. Pollutants with ambient standards remain the chief focus of air quality management activities around the nation.

Air quality standards are set at levels which provide a reasonable margin of safety and protect the health of the most sensitive individuals in the population. Pollutants for which ambient standards have been set are referred to as "criteria pollutants." Criteria pollutants include: (1) ozone, (2) CO, (3) NO_2, (4) sulfur dioxide (SO_2), (5) $PM_{10,}$, (6) fine particulate matter, ($PM_{2.5}$, comprised of particles less than 2.5 microns in diameter) and (7) lead. The Basin fails to meet national standards for O_3, CO, and PM_{10} and therefore is considered a federal "non-attainment" area for these pollutants. In addition, the USEPA recently adopted revised national standards for ozone and new national standards for fine particulates. Although no official determination has been made, the Basin will likely fail to meet these standards. However, at present, no methodologies for determining impacts related to $PM_{2.5}$ have been developed nor have any strategies or mitigation programs for this pollutant been developed or adopted by federal, state or regional agencies.

Additional standards for most of the criteria and other pollutants have been set by the state of California. California standards tend to be more restrictive than national standards, and are based on health and welfare concerns. California has also set standards for sulfates, hydrogen sulfide, vinyl chloride and visibility-reducing particles. Table 5 on page 7, shows the California and national ambient air quality standards currently in effect for criteria pollutants.

(b) Existing Pollutant Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Basin. The closest monitoring station, and most representative of existing air quality conditions in the area of the West Bluffs project, is the Southwest Coastal Los Angeles Monitoring Station located at 5234 West 120th Street in the City of Hawthorne. Criteria pollutants, including ozone, CO, SO_2, NO_2, particulates, and lead, are monitored at this station. Sulfate, a non-criteria pollutant, is also measured. The most recent data available from this monitoring station is from the years 1992 to 1996. This data, shown in Table 6 on pages 9 and 10, shows, the following pollutant trends:

Ozone - The maximum ozone concentration recorded during the 1991 to 1995 period was 0.15 ppm, which was recorded in 1992. During this period, the California standard of 0.09 ppm was exceeded between 3 and 11 times annually, with the lowest number of exceedances recorded in 1994 and 1995. The national standard of 0.12 ppm was exceeded three times during the five-year period, with exceedances occurring in 1992, 1993, and 1996.

Carbon Monoxide - The maximum recorded one-hour concentration during the period was 18 ppm, which was recorded in 1992. During this time period, there were no exceedances of the

Table 5

AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards[a]	National Standards[a]	Pollutant Health Effects	Major Pollutant Sources
Ozone (O_3)	1 Hour	0.09 ppm (180 $\mu g/m^3$)	0.12 ppm (235 $\mu g/m^3$)	High concentrations can directly affect lungs, causing irritation. Common effects are damage to vegetation and cracking of untreated rubber.	Motor vehicles.
	8 Hour	---	0.08 ppm		
Carbon Monoxide (CO)	8 Hour	9 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	Interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)		
Nitrogen Dioxide (NO_2)	Annual Average	—	0.05 ppm (100 $\mu g/m^3$)	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, railroads.
	1 Hour	0.25 ppm (470 $\mu g/m^3$)	---		
Sulfur Dioxide (SO_2)	Annual Average	—	80 $\mu g/m^3$ (0.03 ppm)	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants and metal processing.
	24 Hour	0.05 ppm (131 $\mu g/m^3$)	365 $\mu g/m^3$ (0.14 ppm)		
	1 Hour	0.25 ppm (655 $\mu g/m^3$)	---		
$PM_{2.5}$	24 Hour	---	65 $\mu g/m^3$	May irritate eyes and respiratory tract. Absorbs sunlight, reducing amount of solar energy reaching the earth. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities such as wind-raised dust and ocean spray.

Table 5 (Continued)

AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards[a]	National Standards[a]	Pollutant Health Effects	Major Pollutant Sources
	Annual Arithmetic Mean	---	15 $\mu g/m^3$		
Suspended Particulate Matter (PM_{10})	Annual Geometric Mean	30 $\mu g/m^3$	---	May irritate eyes and respiratory tract. Absorbs sunlight, reducing amount of solar energy reaching the earth. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities such as wind-raised dust and ocean spray.
	24 Hour	50 $\mu g/m^3$	150 $\mu g/m^3$		
	Annual Arithmetic Mean		50 $\mu g/m^3$		

[a] *ppm = parts per million, $\mu g/m^3$ = micrograms per cubic meter, mg/m^3 = milligrams per cubic meter.*

Source: Planning Consultants Research based on SCAQMD, Air Quality Handbook for Preparing Environmental Impact Reports, Revised April 1993 and CARB, ARB Fact Sheet 38, Revised 1988.

Table 6

POLLUTANT STANDARDS AND SOUTHWEST COASTAL LOS ANGELES MONITORING STATION AMBIENT AIR QUALITY DATA

	1992	1993	1994	1995	1996
Ozone (O_3)					
California Standard (1-hr avg. > 0.09 ppm)					
National Standard (1-hr avg. > 0.12 ppm)					
Maximum Concentration (ppm)	0.15	0.13	0.11	0.12	0.13
Number of Days California Standard Exceeded	11	9	3	3	8
Number of Days National Standard Exceeded	1	1	0	0	1
Percent samples exceeding national standard	0	0	0	0	0
Carbon Monoxide (CO)					
California standard (1-hr avg. > 20 ppm)					
California standard (8-hr avg. > 9 ppm)					
National standard (1-hr avg. > 35 ppm)					
National standard (8-hr avg. > 9 ppm)					
Maximum concentration 1-hr period (ppm)	18	16	14	11	13
Maximum concentration 8-hr period (ppm)	12.3	10.7	12.0	8.9	11.6
Number of days California 1-hr standard exceeded	0	0	0	0	0
Number of days national 1-hr standard exceeded	0	0	0	0	0
Number of days California 8-hr standard exceeded	11	6	8	0	6
Number of days national 8-hr standard exceeded	7	3	5	0	5
Nitrogen Dioxide (NO_2)					
California Standard (1-hr avg. > 0.25 ppm)					
National Standard (AAM > 0.05334 ppm)					
Maximum 1-hr concentration (ppm)	0.19	0.16	0.22	0.18	0.15
Annual Arithmetic Mean (AAM)	0.0320	0.0300	0.0322	0.0305	0.0285
Number of days California standard exceeded	0	0	0	0	0
Sulfur Dioxide (SO_2)					
California standard (1-hr avg. > 0.25 ppm)					
National standard (AAM > 0.03 ppm)					

Table 6 (continued)

POLLUTANT STANDARDS AND SOUTHWEST COASTAL LOS ANGELES MONITORING STATION AMBIENT AIR QUALITY DATA

	1992	1993	1994	1995	1996
Maximum 1-hr concentration (ppm)	0.15	0.07	0.04	0.06	0.06
Annual Arithmetic Mean (AAM)	0.0057	0.0031	0.0022	0.0027	0.0025
Number of days California standard exceeded	0	0	0	0	0
Number of days national standard exceeded	0	0	0	0	0
Suspended Particulates (PM_{10})					
California standard (24-hr avg. > 50 $\mu g/m^3$)					
National standard (24-hr avg. > 150 $\mu g/m^3$)					
Maximum 24-hr concentration ($\mu g/m^3$)	67	91	81	136	107
Percent samples exceeding California standard	9	15	18	14	8
Percent samples exceeding national standard	0	0	0	0	0

AAM = Annual Arithmetic Mean *ppm = parts per million* *$\mu g/m^3$ = micrograms per cubic meter*

Note: Ambient data for airborne lead is not included in this table since the South Coast Air Basin is currently in compliance with California and national standards for lead.

Source: South Coast Air Quality Management District, Air Quality Data 1992-1996.

California or national one-hour carbon monoxide standards. The maximum recorded eight-hour CO was 12.3 ppm, which was recorded in 1992. The California and national eight-hour CO standards were exceeded numerous times during the period.

Nitrogen Dioxide - The highest recorded one-hour average nitrogen dioxide concentration 0.22 ppm in 1994. No exceedances of either the national or the California standards occurred during this time period.

Sulfur Dioxide - No violations of the California or national standards were recorded during this time period.

Particulates (PM_{10}) - The highest recorded 24-hour concentration during the period 1992 to 1996 was 136 micrograms per cubic meter of air ($\mu g/m^3$) of particulates, which was recorded in 1995. During this same time period, the California PM_{10} standard was exceeded between 8 and *18* percent of the time annually with the lowest percent of exceedances in 1996. PM_{10} is monitored every six days coincident to a national schedule; thus, PM_{10} exceedances are based on the number of days sampled. The less stringent national standard was not exceeded during the period.

Lead - The Basin is currently in compliance with California and national standards for lead.

Fine Particulates ($PM_{2.5}$) - Because the standard for $PM_{2.5}$ has only recently been established, no monitoring data are available for this pollutant.

(c) Emissions from Current On-Site Activity

The West Bluffs project-site is currently undeveloped. No emissions are currently associated with the on-site activity.

(d) Sensitive Receptors

Some population groups, such as children, the elderly, and acutely ill and chronically ill persons, especially those with cardio-respiratory diseases, are considered more sensitive to air pollution than others. No sensitive land use receptors were identified in the immediate vicinity of the project site.

2. ENVIRONMENTAL IMPACT

a. Significance Thresholds

The SCAQMD has established thresholds of significance for the assessment of air quality impacts attributable to private development projects. These thresholds are set forth in the SCAQMD's CEQA Air Quality Handbook and apply to construction activities as well as stationary and regional mobile emissions occurring during post-construction occupancy. A project is deemed to have a significant impact on regional air quality if emissions (specified in either pounds of pollutant emitted per day or per quarter) of specified pollutants related to either project

construction or operation exceed the significance threshold. These regional significance thresholds are summarized in Table 7 on page 13.

b. Methodology

Air quality planning within the Basin is based on conformance with the NAAQS and CAAQS. A project may also have a significant impact upon local area air quality if it causes or significantly exacerbates an existing exceedance of an NAAQS in the area of the project. Modeling methodologies have been developed to assess CO concentrations from mobile source traffic in the vicinity of the site. Accordingly, significant environmental impacts would occur when either NAAQS or CAAQS for CO are exceeded or measurably increased as defined by the SCAQMD. All other criteria pollutants are regional in effect and are not specifically modeled for local concentrations because they quickly disperse and are impractical to model in the same manner as CO.

c. Project Impact

Analysis of the potential air quality impacts of the proposed West Bluffs project was conducted for both construction and post-construction operation phases of the facility. For each of these phases, the analysis included consideration of regional emissions. For post-construction operations, the analysis addresses local area concentrations of a specific pollutant. CO is the only pollutant for which standardized modeling methodologies for estimating localized concentrations have been developed and approved by SCAQMD. Therefore, localized concentrations of CO emissions generated from mobile sources during the operational phase of the project were evaluated.

(1) Construction

Construction of the proposed project would generate pollutant emissions from the following activities: (1) grading operations; (2) travel by construction workers to the sites; (3) delivery and hauling of construction materials and supplies to and from the project sites; (4) fuel combustion by on-site construction equipment; and, (5) the application of architectural coatings and other building materials that release reactive organic compounds (ROC).

Table 7

SCAQMD SIGNIFICANCE THRESHOLDS

	Construction Pounds per Day	Construction Tons per Annual Quarter	Post-Construction Operations Pounds per Day
Carbon Monoxide	550	24.75	550
Nitrogen Oxides	100	2.50	55
Reactive Organic Compounds	75	2.50	55
Particulate Matter	150	6.75	150
Sulfur Oxides	150	6.75	150

Source: South Coast Air Quality Management District, CEQA Air Quality Handbook, November 1993.

Construction impacts are calculated based on the type and magnitude of development which would be accommodated under the proposed project, the time line for project construction, the mix of construction equipment required to build the project, and emission factors from the SCAQMD's CEQA Air Quality Handbook. Grading/excavation was determined to produce the greatest regional construction emissions impact because this scenario represents the highest projected level of concurrent construction activity over the largest area and the highest projected levels of construction equipment use during the construction phase. This scenario was used to calculate the worst-case construction quarter for the project.

Estimates of regional construction emissions were based upon the following assumptions:

- Construction equipment would be diesel-powered and would operate simultaneously for ***ten*** hours per day for ***grading operations***;
- Equipment used for site preparation would include ***a grader,*** scrapers, a backhoe, and loaders. Other equipment that may be used but would not necessarily be in simultaneous use would include a water truck;
- A maximum of approximately ***461,000*** cubic yards of soil would be excavated;
- A maximum of approximately ***250,000*** cubic yards of soil would be exported;
- Demolition debris would be hauled to the nearest available landfill site; and

- Fugitive emissions of particulate matter (50 percent of which is PM_{10}) emitted from earth moving activities and travel on unpaved routes on the construction sites, in accordance with EPA's APPENDIX-42 and the SCAQMD's CEQA Air Quality Handbook.

Construction emissions would vary over this time period by phase of construction, with the demolition and grading/excavation phases generating the largest quantity of emissions. This results from the large number of construction vehicles that would be utilized on-site plus the truck trips for deliveries and ***export of excavated soil*** to local landfills.

Construction-related regional emissions for the project are presented in Table 8 on page 15. Emissions of NO_x, and PM_{10} would exceed both quarterly and daily SCAQMD significance thresholds. Thus, emissions of these pollutants would result in significant short-term regional air quality impacts. Emissions of CO, ROC and SO_x are considered adverse, but not significant, since levels of these emissions fall below the SCAQMD significance thresholds. Construction emissions are anticipated to occur prior to post-construction occupancy and would not be coincident with operations.

(2) Operational

Air pollutant emissions associated with project occupancy and operation would be generated both by consumption of electricity and natural gas, and by the operation of motor vehicles traveling throughout Southern California. Emissions associated with energy production (electricity and natural gas) are classified by the SCAQMD as area or regional stationary source emissions. Electricity is considered an area source since it is produced at various locations within, as well as outside of, the Basin. Since it is not possible to isolate geographically where electricity production occurs, these emissions are considered to be regional in nature. Emissions of criteria pollutants associated with the production of energy were calculated using emission factors from the SCAQMD's CEQA Handbook.

Emission factors for use in the regional mobile air quality analysis were compiled using the EMFAC7F1.1 emission factor model. This model projects emission rates for motor vehicles based, among other things, on a desired year of analysis, a projected vehicle fleet mix, projected vehicle speeds, and whether these emissions are projected to occur during the summer or the winter months. These emission rates were calculated using the projected ambient temperature range. Assumptions used in preparing the model analysis were consistent with those recommended in SCAQMD's CEQA Air Quality Handbook.

Table 8

PROJECT-RELATED CONSTRUCTION EMISSIONS[a]

	Estimated Emissions				
	CO	ROC	NO_x	SO_x	PM_{10} [b]
Equipment Emissions	*52*	*11*	*161*	*19*	*17*
On Road Vehicles	*62*	*4*	*5*	0	*0*
Fugitive Dust	----	----	----	----	535
Average Daily Emissions (lbs/day) [c]	*114*	*15*	*166*	*19*	*552*
SCAQMD Daily Threshold (lbs/day)	550	75	100	150	150
Lbs/Day Over (Under)	*(436)*	*(60)*	*66*	*(131)*	*402*
Average Quarterly Emissions (tons/quarter)	*3.85*	*0.51*	*5.6*	*0.64*	*18.63*
SCAQMD Quarterly Threshold (tons/quarter)	24.75	2.5	2.5	6.75	6.75
Tons/Quarter Over (Under)	*(20.9)*	*(2.0)*	*3.1*	*(6.1)*	*11.9*

[a] *Worst-case construction impacts are based upon the highest projected quarterly emissions occurring during demolition and site preparation.*

[b] *Fugitive dust emissions based on USEPA, AP-42 assumptions.*

[c] *Daily estimate based on 22.5 working days per month.*

Source: Planning Consultants Research, ***October 1998****. Construction emission calculation worksheets are included in Appendix* ***C of this Subsequent Final EIR****.*

Table 9 on page 16, presents regional stationary and mobile source emissions attributable to operation of the proposed project. Total regional pollutant emissions generated by operation of the project were determined by combining emissions resulting from electricity production, natural gas consumption, other stationary sources and mobile sources. As indicated in Table 9, total air pollutant emissions associated with project operation would not exceed the SCAQMD's significance thresholds for CO, NO_x ,ROC, SO_x and PM_{10}. Therefore, the project's emission of these pollutants would be adverse, but less than significant.

Table 9

OPERATIONAL EMISSIONS
(POUNDS PER DAY)

	CO	ROC	NO_x	SO_x	PM_{10}
Emission Source					
Mobile Sources [a]	259	19	24	2	3
Stationary Sources (electricity and natural gas consumption) [b]	1	--	4	--	--
Total	**260**	**19**	**28**	**2**	**3**
SCAQMD Significance Threshold	550	55	55	150	150
Over (Under)	(290)	(36)	(27)	(148)	(147)

[a] *Calculated based on daily trips, as presented in the Transportation/Circulation Section.*

[b] *Based on electricity and natural gas consumption taken from the SCAQMD's CEQA Air Quality Handbook.*

Source: Planning Consultants Research, November 1997. Operational emissions calculations are included in Appendix D of the Subsequent Draft EIR.

(3) Local Area CO Emissions

The West Bluffs project is expected to most affect traffic volumes during the P.M. peak hour. Intersections most impacted by project traffic were therefore selected for evaluation of local CO concentrations. The analysis of CO impacts followed the California Department of Transportation Project-Level Carbon Monoxide Protocol, January 1996. It is also consistent with procedures identified through the SCAQMD CEQA Air Quality Handbook. Four receptors, located at each corner of the analyzed intersection were analyzed to determine whether build-out of the project would result in CO concentrations in excess of the national or California CO standards. The following intersections were selected for this analysis because they represent the locations where project-related traffic volumes and traffic congestion would be the highest:

- Lincoln Boulevard and Jefferson Boulevard
- Hughes Terrace and Lincoln Boulevard
- 83rd Street and Lincoln Boulevard

The CALINE-4 model generates results of CO concentrations averaged over a one-hour time period under typical atmospheric conditions for the area. Eight-hour concentrations were manually calculated by converting one-hour concentrations to eight-hour equivalents, using the conversion protocol recommended by the SCAQMD.

The CALINE-4 model determines future CO concentrations by adding the predicted increase in CO concentrations attributable to development of the project to an existing ambient concentration representative of concentration levels at the site. In the CEQA Air Quality Handbook, the SCAQMD has forecast future CO concentrations for each area of the Basin as represented by specific monitoring stations. In this case, the Southwest Coast Los Angeles County Monitoring Station was used because it most representative of existing conditions at the project site. SCAQMD forecasts of future CO concentrations were prepared assuming implementation of all adopted SCAQMD rules and regulations and AQMP proposed rules, regulations, and measures.

The first step in the evaluation of local area impacts was to evaluate baseline conditions at the project site in the buildout year of 2002. Baseline conditions were identified for the P.M. peak hour. The contribution of project traffic to CO concentrations at the three study intersections was then determined by taking the difference between baseline traffic conditions (i.e., future traffic not including the project) and the baseline-plus-project scenario. Finally, emissions from project related traffic were added to the forecast ambient concentration, to determine the future CO concentrations. The projected concentrations do not assume implementation of any intersection mitigation measures discussed in Section IV.N.1., Transportation and Circulation, or any other mitigation measures which would reduce modeled concentrations if such mitigation measures were reflected in the analysis.

The proposed project's contributions to one-hour CO levels are presented in Table 10 on page 18. Table 11 on page 19 presents estimated project contributions to eight-hour CO levels. Based on the CALINE-4 analyses performed, project-related traffic is not anticipated to result in any exceedances of the California or national CO one-hour CO standards at any of the three study intersections. Similarly, eight-hour concentrations at all three intersections would remain below the California and national standards.

Since significant impacts would not occur at the intersections with highest traffic volumes, no significant impacts are projected to occur at any other locations in the study area. Consequently, sensitive receptors in the area (including residences and schools) would not be

Table 10

ONE-HOUR CARBON MONOXIDE CONCENTRATIONS [a] (PPM)
(YEAR 2002)

Intersection	Ambient Concentration	Project	Maximum Concentration
Jefferson Boulevard and Lincoln Boulevard			
Northeast	8.4	0.5	*8.9*
Southeast	8.4	0.3	*8.7*
Southwest	8.4	0.3	*8.7*
Northwest	8.4	0.3	*8.7*
Hughes Terrace and Lincoln Boulevard			
Northeast	8.4	1.1	*9.5*
Southeast	8.4	0.7	*9.1*
Southwest	8.4	0.5	*8.9*
Northwest	8.4	0.3	*8.7*
83rd Street and Lincoln Boulevard			
Northeast	8.4	0.2	*8.6*
Southeast	8.4	0.0	8.4
Southwest	8.4	0.1	8.5
Northwest	8.4	0.3	*8.7*

[a] *The California Standard for 1-hour CO concentration is 20 ppm and the National Standard is 35 ppm.*

Source: Planning Consultants Research, October, 1998. ***Calculation worksheets are included in Appendix D of the Subsequent Draft EIR.***

significantly affected by CO emissions generated by project traffic. Localized air quality impacts related to mobile source emissions would therefore be less than significant.

d. Consistency with Adopted Plans and Policies

The SCAQMD has adopted criteria for assessing consistency with regional plans and the AQMP in its CEQA Air Quality Handbook. This section examines the consistency of the

Table 11

EIGHT-HOUR CARBON MONOXIDE CONCENTRATIONS[a] (PPM)
(YEAR 2002)

Intersection	Ambient Concentration	Project	Maximum Concentration
Jefferson Boulevard and Lincoln Boulevard			
Northeast	6.0	0.5	***6.5***
Southeast	6.0	0.3	***6.3***
Southwest	6.0	0.3	***6.3***
Northwest	6.0	0.3	***6.3***
Hughes Terrace and Lincoln Boulevard			
Northeast	6.0	1.1	***7.1***
Southeast	6.0	0.7	***6.7***
Southwest	6.0	0.5	***6.5***
Northwest	6.0	0.3	***6.3***
83rd Street and Lincoln Boulevard			
Northeast	6.0	0.2	***6.2***
Southeast	6.0	0.0	6.0
Southwest	6.0	0.1	6.1
Northwest	6.0	0.3	***6.3***

[a] *The California standard for eight hour CO concentrations is 9.1 ppm and the national standard for eight hour CO concentrations is 9.5 ppm.*

Source: Planning Consultants Research, October, 1998. ***Calculation worksheets are included in Appendix D of the Subsequent Draft EIR.***

proposed project with the AQMP. Section IV.H., Land Use, of this Subsequent EIR discusses the consistency of the proposed project with applicable policies of the RCPG and other applicable regional and local plans and policies.

(1) SCAQMD Handbook Policy Analysis

In accordance with the procedures established in the SCAQMD Handbook, the following criteria are required to be addressed in order to determine project consistency with SCAQMD and SCAG policies:

- Will the project result in any of the following:
- An increase in the frequency or severity of existing air quality violations; or
- Cause or contribute to new air quality violations; or
- Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP;
- Will the project exceed the assumptions utilized in preparing the AQMP?

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for projects such as the proposed project include forecasts of project emissions in a regional context during construction, and in a regional as well as local context, during project occupancy. These forecasts are provided earlier in this section. Since the consistency criteria identified under the first criterion above all pertain to pollutant concentrations, rather than to total regional emissions, the analysis of the project's impact on localized pollutant concentrations issued as the basis for evaluating project consistency. As discussed in the preceding sections, localized concentrations for CO have been prepared for this project.

As previously indicated, CO has been identified as the preferred pollutant for assessing local area air quality impacts from motor vehicle operations. Based on methodologies set forth by SCAQMD, one measure of local area air quality impacts which can indicate whether the project would cause or affect a violation of an air quality standard would be based on the estimated CO concentrations at selected receptor locations located in close proximity to the project site. As indicated above, carbon monoxide emissions were analyzed using the CALINE-4 model. No violations of the California and national CO standards are projected to occur.

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it must be recognized that air quality planning within the Basin focuses on the attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing and growth trends. Thus, the SCAQMD's second criteria for determining project consistency focuses on

whether or not the proposed project exceeds the assumptions utilized in preparing the forecasts presented in the AQMP.

Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with population, housing and employment growth projections, (2) proposed project mitigation measures, and (3) appropriate incorporation of land use planning strategies. The following discussion provides a detailed analysis of each of these three criteria.

- **Is the project consistent with the population, housing and employment growth projections upon which AQMP forecasted emission levels are based?**

A project is consistent with the AQMP, if it is consistent with the population, housing and employment assumptions which were used in the development of the AQMP. In the case of the 1997 AQMP, two sources of employment data form the basis for the projections of air pollutant emissions shown in the AQMP, including: (1) projections of population, housing and employment growth proposed by the City in the Los Angeles City General Plan Framework; and (2) projections of regional population and employment growth contained in SCAG's Regional Growth Management Chapter (GMC) of the RCPG Plan. The project is included in the Los Angeles City General Plan and therefore, is also included in the populations and housing assumptions of the RCPG Plan.

- **Does the project implement all feasible air quality mitigation measures?**

Implementation of all feasible mitigation measures is proposed by the Applicant to reduce air quality impacts to the extent possible. The proposed project would incorporate a wide array of key air pollution control strategies identified by the SCAQMD, as described below under Mitigation Measures beginning on page ?. All mitigation measures considered feasible would be incorporated into the project.

- **To what extent is the proposed development consistent with the land-use policies set forth in the AQMP?**

As discussed in Section IV.H., Land Use, the West Bluffs project serves to implement the land use policies of the City of Los Angeles, and SCAG. The project provides housing in an area with relatively high concentrations of both commercial and industrial land-uses. The close proximity of the project provides housing to these employment-rich land uses, provides improved opportunities for the use of public transit and other alternative transportation modes, including usage of MTA bus services which will connect the site to the regional Metro Rail System.

Therefore, the AQMP objective of reducing vehicle miles traveled and vehicular air emissions is fulfilled, and the proposed West Bluffs project is consistent with AQMP land use policy.

3. CUMULATIVE IMPACTS

Buildout of year 2002 related projects within a similar time frame as the proposed project would increase short-term emissions for concurrent activities during any day of the construction period. Since the worst-case construction quarter for the project was identified to be significant, any additional construction activities occurring during this time and in the vicinity of the proposed project site would be adding an additional air pollutant emission burden to these significant levels. Quantification of construction emissions from cumulative projects is speculative given the uncertainty over the timing and phasing of construction activities for each of these projects and the extent to which such activity would coincide with the worst day and quarter of the construction process. However, because of the emission levels associated with the project already are projected to have a significant impact, a significant and unavoidable cumulative impact with respect to construction emissions would occur.

Operational emissions associated with buildout of the proposed West Bluffs project would occur along with emissions from other development projects in the vicinity. All projects projected to be built and operational within the project's time frame would likely exceed SCAQMD thresholds for CO, ROC and NO_x. Cumulative air quality impacts would therefore be significant and unavoidable.

4. MITIGATION MEASURES

The following mitigation measures set forth a program of air pollution control strategies designed to lessen the project's significant air quality impacts:

Construction

Land Clearing/Earth-Moving

- The Applicant shall secure any necessary permits from the SCAQMD, including an approved fugitive dust emissions control plan pursuant to SCAQMD Rule 403.

- Non-toxic soil stabilizers shall be applied according to manufacturers' specifications or vegetation shall be planted on all inactive construction areas (previously graded areas inactive for 10 days or more and not scheduled for additional construction activities within 12 months, to the extent feasible).

- Exposed pits (i.e., gravel, soil, dirt) with 5 percent or greater silt content shall be watered twice daily, enclosed, covered or treated with non-toxic soil stabilizers according to manufacturers' specifications.

- All other active sites shall be watered at least twice daily.

- All grading activities shall cease during second stage smog alerts and periods of high winds (i.e., greater than 25 mph) if dust is being transported to off-site locations and cannot be controlled by watering.

- All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer).

- A construction relations officer shall be established by the Applicant to act as a community liaison concerning on-site construction activity, including resolution of issues related to fugitive dust generation.

Paved Roads

- All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite, or shall be paved.

- Streets shall be swept hourly if visible soil material has been carried onto adjacent public paved roads (reclaimed water shall be used if available.)

- Construction equipment shall be inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

Unpaved Roads

- Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

- Traffic speeds on all unpaved roads shall not exceed 15 mph.

The mitigation measures identified above implement SCAQMD measures associated with on-site grading activities, construction equipment travel on paved roads as well as the SCAQMD's intent to control fugitive dust emissions associated with construction equipment travel on on-site unpaved roads and demolition activities.

Operation

No long-term mobile source or stationary source mitigation measures are necessary.

5. ENVIRONMENTAL IMPACT AFTER MITIGATION

After implementation of all feasible mitigation measures as described above, construction operations would generate NO_x and PM_{10} emissions that exceed SCAQMD regional significance thresholds for construction activities. Therefore, construction of the project would have a significant and unavoidable short-term adverse impact on regional air quality.

In the operational phase, the project would result in a net increase in emissions of all criteria pollutants. However, these increased concentrations do not exceed the SCAQMD significance thresholds for any of the criteria pollutants. Therefore, long-term air quality impacts related to operation of the project are considered adverse but not significant. No significant impacts to local CO concentration would occur.

6. COMPARISON TO PREVIOUS EIR CONCLUSIONS

The impacts presented in this Subsequent EIR are similar to those presented in the previous ***1994*** EIR. No substantial difference in the findings regarding the impacts on ambient air quality are noted.

7. COMPARISON TO SUBSEQUENT DRAFT EIR CONCLUSIONS

Air pollutant emissions due to the October 1998 modified project and modified grading program would be slightly higher than those calculated for the project in the May 1998 Subsequent Draft EIR. This is due to the additional excavation and export of soil required.

The difference in emissions calculations based upon the revised excavation and export depend primarily upon the type and number of equipment to be used, and the number and length of the haul trips for exportation of the soil.

Modifications to the grading program include the excavation of an additional 65,000 cubic yards of soil (for a total of 461,000 cubic yards), a reduction in the amount of this excavated soil that would remain on-site for use as fill by 153,000 cubic yards (for a total of 211,000 cubic yards), and an increase in the amount of the excavated soil that would be exported off site by 217,400 cubic yards (for a total of 250,000 cubic yards).[3] *Under the modified program, the exported soil would be delivered to the Playa Vista property just north of the project site. As the Subsequent Draft EIR assumed that the soil would be exported to a landfill, the average trip length for haul trucks would be reduced from 10.17 to 0.25 miles per trip. Due to the greater amount of soil to be moved, the number of haul truck trips needed would increase from 75 to 200 trips per day.*

While the changes to the grading program amount to notable differences in the volume of dirt to be exported and the number of truck trips per day, these changes would result in only slightly higher emissions (on average one to two percent higher than those calculated in the Subsequent Draft EIR). This is due to two elements of the grading program relating to haul trips and to earth moving equipment.

First, the added emissions which would result from the increase in the number of haul trips for soil export was more than offset by the substantial decrease in the trip length for each haul trip. Although more trips would be made, the trips would be much shorter, resulting in a decrease in emissions for haul trips as compared to those reported in the Subsequent Draft EIR.

Secondly, while the volume of earth to be excavated would increase, the amount of equipment required and the hours of operation for that equipment would not change substantially. Based upon SCAQMD methodology, emissions generated by this element of the site preparation process is evaluated based upon the equipment used rather than the volume of earth to be moved. Air impacts are therefore based upon the emissions generated by the construction equipment, however the equipment required must take into consideration the volume of earth to be moved.[4] *The fact that only a small change in equipment mix is required*

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[3] *Amount of excavation and export may actually be less, based upon the revised October 1998 site plan.*

[4] *For example, larger equipment models may be necessary, or more equipment may be required, but the emissions would not increase by the same percentage as the volume of earth to be moved.*

is due to very conservative assumptions utilized in the Subsequent Draft EIR analysis. Specific requirements for the modified grading program have now been confirmed with the project grading contractor. The changes in equipment assumptions over those assumed in the very conservative Subsequent Draft EIR analysis consist of an increase in the number of scrapers from one to four and elimination of the two off-highway trucks.

Therefore, considering the additional requirements of the grading program under more refined assumptions provided by the grading contractor, the total change in emissions due to the modified grading program would be minimal. The changes in impact over those reported in the Subsequent Draft EIR would be less than significant.

III. Comments and Responses to the Subsequent Draft EIR

III. COMMENTS AND RESPONSES TO THE SUBSEQUENT DRAFT EIR

A. INTRODUCTION AND SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS

This Response to Comments Section of the Subsequent Final EIR consists of three required elements defined by CEQA. Section 15132 states in part that the Final EIR shall consist of: (b) comments and recommendations received on the Draft EIR either verbatim or in summary; (c) a list of persons, organizations and public agencies commenting on the Draft EIR; and (d) the responses of the Lead Agency to significant environmental points in the review and consultation process.

The Subsequent Draft EIR for the West Bluffs project was distributed for public review on May 21, 1998 and officially ended on July 6, 1998, lasting two days beyond the required 45-day review period. Comment letters were accepted through July 13, 1998, providing a total of 54 calendar days for public review and comment. During the public review period, a total of 64 comment letters pertaining to the Subsequent Draft EIR were received by the City of Los Angeles Department of Planning. These letters, reproduced in this section of this Subsequent Final EIR, included submissions from Federal, State and City agencies, as well as from organizations and private individuals. Each comment raised in these letters is responded to in this section of the Subsequent Final EIR. A list of all the letters received, along with a summary of the issues addressed in each letter, is contained in the matrix, beginning on page III-2 of this document.

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
FEDERAL, STATE AND REGIONAL AGENCIES																										
United States Department of the Interior Carlsbad Fish and Wildlife Office Ecological Services Jim A. Bartel 2730 Loker Avenue West Carlsbad, CA 92008	1						◆																			
State of California Governor's Office of Planning and Research Antero A. Rivasplata 1400 Tenth Street Sacramento, CA 95814	2																							◆	Compliance with State Clearinghouse requirements.
State of California - Business and Transportation Agency Department of Transportation Stephen J. Buswell, Program Manager District 7, 120 So. Spring Street Los Angeles, CA 90012-3606	3																◆									

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS
(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
Southern California Association of Governments J. David Stein Manager, Performance Assessment and Implementation 818 West Seventh Street, 12th Floor Los Angeles, CA 90017-3435	4																								◆	Not regionally significant.
COUNTY AGENCIES																										
County of Los Angeles Department of Public Works Harry W. Stone/David Yamahara Director of Public Works 900 South Fremont Avenue Alhambra, CA 91803-5100	5					◆											◆			◆					◆	Suggested review by other agencies.
County Sanitation Districts of Los Angeles County Marie L. Pagenkopp Engineering Technician Planning & Property Management Section 1955 Workman Mill Road Whittier, CA 90601-1400	6																								◆	No comment.
CITY OF LOS ANGELES AGENCIES																										
City of Los Angeles Glenn Hirano, Assistant Division Engineer	7	◆				◆	◆											◆		◆						

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS
(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
City of Los Angeles Department of Transportation Wilber Takashima for David G. Leatherman Transportation Engineer 221 N. Figueroa Street, Suite 500 Los Angeles, CA 90012	8																◆									
City of Los Angeles Richard E. Olsen, Assistant Fire Marshall Bureau of Fire Prevention and Public Safety	9																	◆								
OTHER CITY AGENCIES																										
City of El Segundo Department of Planning and Building Safety Laurie B. Jester, Senior Planner Planning and Building Safety Department 350 Main Street El Segundo, CA 90245-0989	10																								◆	No comment.
ORGANIZATIONS AND BUSINESSES																										
Christine Balk 80th Street Bluff Association 7742 West 80th Street Playa Del Rey, CA 90293	11																								◆	Opposition to proposed project.

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS

(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
Westchester Vitalization Corporate Jeanne Breunig, President 6320 West 84th Place Westchester, CA 90045	12																								◆	Support of proposed project.
Friends of Ballona Wetlands Samantha Christie, M.A. Consultant Wetlands Information and Planning Services Howard Towner, Ph.D. Professor of Biology, Loyola Marymount University, Member, Board of Directors 6953 Trolley Way Playa del Rey, CA 90293	13			◆		◆	◆											◆						◆		
West Bluffs Steering Committee Craig S. Eggers [No Address]	14	◆		◆			◆										◆	◆				◆				
Topanga Anthropological Consultants Chester King, Ph.D. P.O. Box 826 Topanga, CA 90290	15						◆																◆			
Spirit of the Sage Council Kathy Knight, Wetlands Coordinator P.O. Box 77027-102 Pasadena, CA 91107	16																						◆	◆	◆	Public notification, review period, Playa Vista project.

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS
(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
Catellus Residential Group Peter T. Lauener, Vice President 5 Park Plaza, Suite 400 Irvine, CA 92614	17	◆									◆							◆				◆				
American Indian Movement California AIM, Southern Fern Mathias, Executive Director P.O. Box 65155 Los Angeles, CA 90065	18																						◆			
Howard F. Towner, Ph.D. Professor of Biology, Loyola Marymount University Board Member and Treasurer, Friends of Ballona Wetlands 8114 Westlawn Avenue Los Angeles, CA 90045	19						◆																	◆		
INDIVIDUALS																										
J. C. Anthes 7371 West 81st Street Los Angeles, CA 90045	20																	◆								

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS
(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
Dr. Gary M. Baum Westchester Medical Plaza 8540 Sepulveda Boulevard, Suite 1012 Los Angeles, CA 90045	21																								◆	Support of proposed project.
Joseph E. Berberich 7811 Berger Avenue Playa Del Rey, CA 90293	22	◆		◆			◆											◆				◆				
Roberta F. Bissell 7532 W. 82nd Street Playa del Rey, CA 90293	23																								◆	Support of proposed project.
Theresa Brady 21721 Septo Street #120 Chatsworth, CA 91311	24			◆			◆																			
Roberta Burmeister Norman H. Burmeister 7422 West 80th Street Los Angeles, CA 90045	25																◆			◆		◆			◆	General construction impacts.
Carrie Camilleri 8005 Rayford Drive Los Angeles, CA 90045-2424	26																								◆	Opposition to proposed project.
Bruce Campbell 614 Gretna Greenway Los Angeles, CA 90049	27						◆																◆			

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS
(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
Judith A. Ciancimino 7355 W. 83rd Street Westchester, CA 90045	28																								◆	Support for proposed project.
James Conley [No Address]	29										◆											◆		◆		
John Davis P.O. Box 10152 Marina Del Rey, CA 90295	30			◆		◆	◆											◆				◆	◆	◆	◆	Groundwater level; Playa Vista project; cumulative impacts; gas migration.
Patricia and Franklin Dey 7432 W. 80th Street Los Angeles, CA 90045	31	◆		◆							◆						◆					◆				
Craig S. Eggers 7813 West 83rd Street Playa del Rey, CA 90293-7920	32																								◆	General comments regarding open space, views, see Letter 14.
Alan C. Engebretsen 8220 Rayford Drive Los Angeles, CA 90045-2428	33				◆		◆										◆									
Rex Frankel 6038 W. 75th Street Los Angeles, CA 90045	34						◆										◆						◆		◆	Notification requirements.

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS
(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
James and Carol Garvey 7427 W. 82nd Street Los Angeles, CA 99045	35	◆		◆		◆					◆						◆	◆		◆		◆				
Richard Harris and Ann Therese Canfield 7900 Hulbert Avenue Playa del Rey, CA 90293	36																◆					◆				
Randall E. Hartman 21718 Marjorie Avenue Torrance, CA 90503	37						◆																◆	◆		
Kelli G. Hawley Craig C. Adams 7500 West 80th Street Westchester, CA 90045	38					◆					◆						◆	◆				◆				
Harriet Hofman 7343 W. 83rd Street Los Angeles, CA 90045 Edward and Cathy Herrera 7340 W. 82nd Street Los Angeles, CA 90045	39	◆															◆					◆				
Julian J. and Marline Horowitz 7540 W. 80th Street Los Angeles, CA 90045	40	◆					◆															◆				

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS
(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
Steve and Elaine Kane 7452 W. 80th Street Westchester, CA 90045	41	◆		◆	◆						◆						◆					◆				
Steve and Elaine Kane 7452 W. 80th Street Westchester, CA 90045	42										◆											◆				
Stephen J. Kane 7452 W. 80th Street Westchester, CA 90045	43																								◆	Availability of previous documents; notice requirements; review period extension.
Elaine Kane 7452 W. 80th Street Westchester, CA 90045	44				◆																					
Robert Kinslow [No Address]	45					◆	◆																◆		◆	Cost benefit analysis; notification requirements.
Kathy Knight 1122 Oak Street Santa Monica, CA 90405	46																								◆	Extension of public review period.
Sharon & Larry Lavenberg 7508 West 80th Street Westchester, CA 90045	47			◆													◆	◆				◆				

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS
(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
Bodo Lemke 7501 W. 85th Street Playa del Rey, CA 90293	48																								◆	Support for project.
Mrs. Clay W. Lowrey 8045 Rayford Drive Los Angeles, CA 90045	49																◆	◆				◆				
Dale Neumen 7546 W. 80th Street Los Angeles, CA 90045	50			◆							◆						◆	◆						◆		
Denise O'Brien-Gunnell 8035 Nardian Way Los Angeles, CA 90045	51																								◆	Support for project.
Stavros & Anne-Marie Olympios 8017 Rayford Drive Los Angeles, CA 90045-2424	52																◆	◆				◆		◆		
Marit A. Powell 7371 West 81st Street Los Angeles, CA 90045	53																	◆								
George Prengaman 7700 W. 83rd Street Playa Del Rey, CA 90293	54			◆							◆						◆	◆				◆				

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS
(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
Chris Rembert 7433 W. 81st Street Playa Del Rey, CA 90293	55			◆							◆							◆							◆	Project approval process.
Mrs. Jennifer Rockwell 4482 Jasmine Avenue Culver City, CA 90232	56																◆								◆	Support for project.
Richard A. Schoenfeld, C.P.A. 7778 W. 79th Street Playa del Rey, CA 90293-7902	57			◆			◆				◆						◆	◆				◆			◆	Notification process.
Thomas J. Stelmach, D.D.S. Westchester Medical Plaza 8540 S. Sepulveda Boulevard, Suite 808 Los Angeles, CA 90045	58						◆																		◆	Support for project.
Richard Terzitre [No Address]	59																							◆	◆	Fencing; public land; public review process.
Patricia Trujillo 7377 W. 83rd Street Los Angeles, CA 90045	60			◆			◆																			
John Ulloth 8016 Gosford Avenue North Hollywood, CA 91605	61			◆			◆																			

SUMMARY OF ISSUES RAISED IN WRITTEN COMMENTS

(continued)

COMMENTORS	LETTER NUMBER	II. PROJECT DESCRIPTION	III. ENVIRONMENTAL IMPACT ANALYSIS	A. Earth	B. Air	C. Water	D. Plant Life and Animal Life	E. Animal Life (See Section D)	F. Noise	G. Light and Glare	H. Land Use	I. Natural Resources	J. Risk of Upset/Human Health	K. Population (See Section L)	L. Population and Housing	M. Right of Way and Access	N. Transportation and Circulation	O. Public Services	P. Energy Conservation	Q. Utilities	R. Safety	S. Aesthetics and Views	T. Cultural Resources	IV. Alternatives	Other	NOTES
Ataollah Walizadeh Mohammad Walizadeh Nahid Emam Walizadeh Omid Walizadeh [No Address]	62																					◆			◆	Opposition to project.
Dorathy M. Wood 22228 Cass Avenue Woodland Hills, CA 91364	63										◆															
Mrs. Florence Wood 7526 W. 80th Street Los Angeles, CA 90045	64			◆													◆									

B. FEDERAL, STATE AND REGIONAL AGENCIES

LETTER NO. 1
Signed by: Jim A. Bartel

July 6, 1998

United States Department of the Interior,
Carlsbad Fish and Wildlife Office Ecological Services
Ecological Services
2730 Loker Avenue West
Carlsbad, CA 92008

Subject: Subsequent Draft Environmental Impact Report, West Bluffs Project, City of Los Angeles, California (TT 51122,91-0675-SUB(CDP)(PP)(ZBA))

Comment 1-1:

The U.S. Fish and Wildlife Service (Service) has reviewed the Subsequent Draft Environmental Impact Report (SDEIR) for the proposed West Bluffs Project located in the City of Los Angeles, Los Angeles County, California (NOP/PRC). The project area is adjacent to the Ballona Wetlands. Our comments are pursuant to the Endangered Species Act of 1973, as amended (Act), California Environmental Quality Act (e.g., CEQA Guidelines § 15082), and other authorities regulating wildlife resources. The comments and recommendations in this letter are based on the Notice of Preparation/Pre-draft Request for Comments (NOP/PRC) dated October 28, 1997, our response to the NOP/PRC dated December 1, 1997, a letter from the California Department of Fish and Game to the NOP/PRC dated December 4, 1997, a site visit with Steve Nelson (Planning Consultants Research) and Robert James of my staff on July 1, 1998, and other information available to the Service.

The SDEIR describes the preferred project alternative for the construction of 120 single-family residences and associated infrastructure on about 44 acres on the Playa del Rey Bluffs, located on the 7400 block of 80th Street and Berger Avenue. Including the "no project" alternative, a total of 7 alternatives are presented in the SDEIR. On the July 1, 1998, site visit, erosion within Hastings Canyon and the associated first-order stream, was noted. The stream contains a few large-stature *willow (Salix* sp.) trees and is about 400 feet in length. The bluff top and slope consist of small areas of coastal sage scrub, primarily California sagebrush *(Artemisia*

californica), within non-native grassland and ruderal habitats. Non-native shrub vegetation on the slope is a relatively minor component. The primary shrub species, in order of abundance, are castor bean *(Ricinus communis),* tree tobacco *(Nicotiana glauca),* and pampas grass *(Cortaderia jubata).*

Implementation of the proposed project would result in permanent impacts to about 27 acres of the site, including 0.08 acres of waters of the United States and 0.04 acres of wetlands. Hastings Canyon would be filled. Proposed environmental mitigation measures include preservation of 17 acres (38 percent of the project site area) as open space on the bluff face and habitat enhancement in 0.90 acres in the open space area. No creation or enhancement of wetlands and waters of the United States is currently proposed.

Response 1-1:

These comments are acknowledged for the record and will be forwarded to the decision makers for their review and consideration in reviewing the project proposal.

Comment 1-2:

The Service offers the following comments and recommendations regarding project-associated biological impacts based on our knowledge of sensitive and declining habitat types and species in southern California. These comments are also offered in the context of the extremely limited remaining wetland and riparian habitats in the Los Angeles Basin.

The Service concurs that habitat restoration of the slope proposed to remain as open space by controlling non-native, invasive species would be a beneficial mitigation measure. Given the relatively small number of non-native shrubs, the program would have a greater probability of success if it was done along the entire bluff face and conducted for a minimum of 5 years. In addition, the mitigation program should include planting of native coastal sage scrub species within the open space to compensate for habitat loss on the bluff top.

Response 1-2:

In addition to bluff slope restoration required by CDFG to mitigate impacts to jurisdictional streambeds, re-establishment and enhancement of the bluff slope (totaling approximately 14.7[1] acres or 33 percent of the project site) is proposed as part of project implementation as stated in Section II.C, Statement of Objectives, on page 52 of the Subsequent Draft EIR. Furthermore, as stated in Section II.D, Open Space Features, on page 57 of the Subsequent Draft EIR, it is stated that the bluff face would be revegetated with native plant materials, which include native coastal sage scrub species. Implementation of this objective is discussed within the *Bluff Area Stabilization and Maintenance Program*, which is included as the final item in Appendix F, Biological Resources Reports, in Volume 2, Technical Appendices of the Subsequent Draft EIR. The applicant has entered into a binding agreement with Playa Capital Company (Playa Vista) wherein Playa Vista will assume ownership and maintenance responsibility of the bluff face. It is assumed that Playa Vista or its successor will maintain the bluff face in conjunction with their Playa Vista open space areas located in the Ballona Wetlands. If Playa Vista does not assume ownership and maintenance responsibility, it will be assumed by a West Bluff's homeowners' association. A qualified, certified specialist will determine if the revegetation is sufficiently (90 percent) established before Playa Vista is required to assume maintenance responsibilities, pursuant to the agreement.

Comment 1-3:

With regard to wetland impacts to the first-order stream and consequent loss of hydrological functions such as groundwater recharge and nutrient input to the adjacent Ballona Wetlands, avoidance should be further examined. Consideration should be given to a plan modification that avoids wetland impacts and allows for slope stabilization within the Hastings and the other smaller canyon areas. If avoidance of wetland and waters of the United States cannot be avoided or minimized, off-site compensatory wetland mitigation, with no net loss of habitat, should be implemented as close as possible to the project area. If feasible, mitigation consisting of in-kind wetland mitigation near the adjacent Ballona Wetlands would be an appropriate choice.

Thank you for the opportunity to comment on this SDEIR. If you have any questions or wish to further discuss project-related issues, please contact Robert James, Fish and Wildlife Biologist, at the letterhead address or at (760) 431-9440.

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[1] *This includes revised open space areas, Lots 12, 124, and 126, but does not include Cabora Drive, "A" Street or pedestrian trail. Total open space for the project site would be 17.33 acres, see Section II of this Subsequent Final EIR (Corrections and Additions to the Subsequent Draft EIR) for details regarding total open space.*

Response 1-3:

In the absence of formally listed endangered, threatened or rare plant or wildlife species, regulatory authority for jurisdiction over on-site wetlands, "waters of the United States" ("waters") and streambeds has been determined to rest solely with the US Army Corps of Engineers (Corps) and California Department of Fish and Game (CDFG). Accordingly, these agencies have been consulted and have indicated their requirements for project approval. These requirements are based on a number of considerations, including statutory obligation and ecological factors. The agencies have concurred regarding the relatively low biological resource value represented by the on-site drainages.[2] Furthermore, with regard to Corps jurisdiction, project impacts total less than one-third of an acre and thereby qualify for Nationwide Permit No. 26; this is non-reporting and no mitigation is, technically, required. Accordingly, the Corps does not comment in writing with respect to Nationwide Permits; regulations only require that the applicant notify the Corps in writing within 30 days after completion of the project, identifying the owner, project name, location and acres of wetland impacted. Moreover, analysis of on-site mitigation opportunities is commensurate with the level of project impacts to these resources (i.e., minimal). As total avoidance of the drainage features would preclude project objectives from being met (e.g., to provide housing on the property; to develop the property in compliance with applicable plans; to restore the biological resource value, improve the safety and reduce erosion of the bluff face; to provide passive, accessible open space; to complete the neighborhood setting on 80th Street and Rayford Drive; and to improve automobile circulation in the adjoining neighborhoods), restoration of upland habitat has been deemed sufficient as mitigation for project impacts to jurisdictional wetlands, "waters" and streambeds.

For further discussion of the relationship between the project site and Ballona Wetlands, please refer to Response 13-1. Restoration of upland habitat, in association with corrective grading and stabilization of the unstable bluffs and drainage, especially Hastings Canyon, is anticipated to reduce sedimentation caused by unchecked surface flow across the bluffs into the Ballona Wetlands. Moreover, as stated in section IV.C.1, Surface Water Runoff/Hydrology, the storm drain system proposed as part of the project would also re-route surface flows away from the bluff face and into the Manchester and Lincoln Storm Drains, further reducing erosion and allowing for storm water cleansing via a catch basin and outfall filters. The reduction of sedimentation would result in improved water quality within the Ballona Wetlands and saltwater marsh, as well as the Pacific Ocean.

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[2] *Per telephone conversations with Aaron Allen, Senior Project Manager, and Cheryl Conel, Former Project Manager, North Coast Section, US Army Corps of Engineers, Regulatory Branch, Los Angeles District, on September 16th and 17th, 1998, respectively.*

LETTER NO. 2
Signed by: Antero A. Rivasplata

July 7, 1998

State of California
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Subject: WEST BLUFFS SCH #: 97111005

Comment 2-1:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency (ies) is (are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that

> "a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation.

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency (ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality

Act. Please contact at (916) 445-0613 if you have any questions regarding the environmental review process.

Response 2-1:

Comments from the responsible agencies have been received and are responded to herein. The State Clearinghouse number for this project will be included in all correspondence to the Governor's Office of Planning and Research and in all public notifications concerning this EIR.

LETTER NO. 3
Signed by: Stephen Buswell

June 12, 1998

State of California–Business and Transportation Agency
Department of Transportation
District 7, 120 So. Spring St.
Los Angeles, CA 90012-3606

Subject: Project Review Comments:

SCH NO. 97111005

Comment 3-1:

Thank you for the opportunity to provide comments regarding the above referenced project. The project is a proposal to build 120 single family residences on 44 acres with 8 open space lots and a pedestrian trail system.

Our review of the document indicates, the need to identify specific traffic mitigation to reduce significant impact as a result of the project and the source responsible for mitigation costs.

Please incorporate into the DEIR information about planned improvements by Catellus Residential Group to Lincoln Boulevard and a more detailed listings of planned improvements by other agencies.

If you have any questions regarding this response, please feel free to contact the undersigned at (213) 897-4429 and refer to our IGR/CEQA # 980560/NP.

Response 3-1:

As noted in Section IV.N.1 of the Subsequent Draft EIR, the project will not result in any significant traffic impacts, and no traffic mitigation is required. Nevertheless, several measures are proposed to facilitate adequate traffic flow in the project vicinity during the construction and operational phases. As listed in Subsequent Draft EIR Section II.E, Discretionary Review, the project will require an Encroachment Permit from Caltrans. In this regard, the applicant is

working with Caltrans in the design of the necessary roadway dedications and improvements along the Lincoln Boulevard frontage of the site. See Section II, Corrections and Additions to the Subsequent Draft EIR.

LETTER NO. 4
Signed by: J. David Stein

June 16, 1998

Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

RE: SCAG Clearinghouse I9800304 West Bluffs Project Subsequent, Draft Environmental Impact Report

Comment 4-1:

We have reviewed the above referenced document and determined that it is not regionally significant per Areawide Clearinghouse criteria. Therefore, the project does not warrant clearinghouse comments at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at that time.

A description of the project was published in the **June 15, 1998** Intergovernmental Review Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1917 or Bill Boyd at (213) 236-1960.

Response 4-1:

The information provided that the proposed project is not regionally significant per Areawide Clearinghouse criteria is acknowledged. The Southern California Association of Governments (SCAG) Clearinghouse number for this Draft EIR will be included in all correspondence to SCAG. Upon completion of the Final EIR, a copy will be forwarded to SCAG to the attention of the Clearinghouse Coordinator.

C. COUNTY AGENCIES

LETTER NO. 5
Signed by: David Yamahara

July 1, 1998

County of Los Angeles
Department of Public Works
900 South Fremont Avenue
Alhambra, California 91803-1331

Comment 5-1:

Thank you for the opportunity to provide comments on the DEIR for the proposed West Bluffs. We have reviewed the DEIR and offer the following comments:

Environmental Programs

The EIR needs to fully assess the impact of this project on the quality of stormwater runoff. The EIR should reference Order No. 96-054, National Pollutant Discharge elimination [*sic*] System permit CAS614001 issued by the California Regional Water Quality Control Board to the County and local agencies.

Response 5-1:

With implementation of mitigation measures included on pages 127-128 of the Subsequent Draft EIR, impacts associated with the quality of storm water runoff are not anticipated to be significant. The County National Pollutant Discharge Elimination System Permit referenced on page 83 of the Subsequent Draft EIR is updated, please see Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 5-2:

The landfill remaining capacities and permit expiration dates provided on Table 58, page 338, is not consistent with the Countywide Siting Element, June 1997 edition, as referenced. Please revise accordingly.

If you have any questions regarding the above comments, please contact Mr. Chuk Agu of our Environmental Programs Division at (626) 458-2188.

Response 5-2:

See corrected Table 58 in Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 5-3:

Traffic and Lighting

We recommend revising the related projects' list. We do not believe that the following related projects used to forecast the future traffic conditions will be built within the Project's anticipated build out Year 2002:

- Marina del Rey Local Coastal Plans (County of Los Angeles Department of Beaches and Harbors)

- LAX Master Plan Expansion (City of Los Angeles Department of Transportation)

The proponents of these related projects should be contacted for information regarding how much of the development is expected to occur by the Year 2002. In addition, a 500-unit apartment complex Project (Marsh Holtzman/ Snyder Commercial) at the northeast corner of Lincoln Boulevard and Fiji Way in the City of Los Angeles should be included in the list.

Response 5-3:

Finalized construction/development timetables for the Marina del Rey Local Coastal Plans (Related Project No. 9) and the LAX Master Plan Expansion (Related Project No. 14) projects are tentative, and although full implementation of these projects is not expected by 2002, partial completion is possible. As noted in the footnote to Table 32 (pages 243-44), these projects are assumed to be ten percent developed by the study year. The 500-unit apartment project noted, while not specifically identified, is expected to contribute only nominal traffic volumes to the study intersections, and its effects are addressed through the use of the assumed ambient traffic growth factor.

Comment 5-4:

Lincoln Boulevard north of the Project site is a very heavily congested roadway. The traffic demand exceeds the roadway capacity and most of the intersections along this roadway are already operating at poor Levels of Service (LOS). The traffic generated by this Project could further exacerbate this condition. We recommend the traffic study be expanded to include the following intersections, which are under the joint jurisdiction of the County and City:

- Lincoln Boulevard/Bali Way
- Lincoln Boulevard/Mindanao Way
- Lincoln Boulevard/Fiji Way

The study should identify the traffic impacts and ensure that appropriate mitigation measures are proposed. The study should also address the cumulative impacts generated by this and other nearby developments and include LOS analysis for affected intersections. If traffic signal modifications or other mitigation measures are warranted at the affected intersections, the developer should contribute to the cost. In addition, the developer should determine his proportionate share of signal or other mitigation costs and submit this information to this Department for review and approval. A copy of our Traffic Impact Analysis Report Guidelines is enclosed.

Due to the fact that the traffic generated by the Project may have cumulative impacts on intersections along Lincoln Corridor, we recommend the developer contribute its share towards cumulative mitigation measures similar to the contributions made by the projects in the City of Culver City and the County of Los Angeles.

Response 5-4:

As described in detail in Section IV.N.1 of the Subsequent Draft EIR, the proposed project is not expected to result in significant traffic impacts at any of the eight study intersections examined. Significant impacts would not be expected at intersections further from the proposed project (such as those mentioned in the comment). Thus, there is no reason to expand the study area.

Comment 5-5:

We recommend that the State of California Department of Transportation and California Coastal Commission review this document including our comments for impacts/mitigations within their jurisdictions.

If you have any questions regarding the above comments, please contact Mr. Suen Fei Lau of our Traffic and Lighting Division at (626) 458-5909.

If you have any questions regarding the environmental reviewing process of this Department, please contact Mr. Vik Bapna at the address on the first page or at (626) 458-4363.

[Attachment not reproduced here: Traffic Impact Analysis booklet.]

Response 5-5:

Caltrans and the California Coastal Commission have received a copy of the Subsequent Draft EIR for review. Comments have been received from Caltrans (see Comment Letter No. 3), but not from the California Coastal Commission.

LETTER NO. 6
Signed by: Marie L. Pagenkopp

June 9, 1998

County Sanitation Districts of Los Angeles
1955 Workman Mill Road
Whittier, CA 90601-1400

Comment 6-1:

West Bluffs

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on May 22, 1998. We offer the following comment regarding sewerage service:

- The Districts do not maintain any facilities within the project area(s).

If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717.

Response 6-1:

The information provided above that the County Sanitation Districts do not maintain facilities within the project area is acknowledged. This comment requires no further response.

D. CITY OF LOS ANGELES AGENCIES

LETTER NO. 7
Signed by: Glenn Hirano, Assistant Division Engineer

July 1, 1998

City of Los Angeles
Development Services Division (Land Development)
Bureau of Engineering

Subject: Request for Comments-Draft Environmental Impact Report-"West Bluffs", EIR No. 91-0675-SUB (CDP) (PP) (ZBA)

Comment 7-1:

Your referral dated May 21, 1998, has been reviewed by the Bureau of Engineering. Please include the following comments in the final Environmental Impact Report (EIR):

1. The proposed Streets "B", "C", "D", "E", "F", and "G" should be designed according to the Standard Plan D-22549, non-continuous street with a 54-foot right-of-way and a 40-foot roadway. Concrete sidewalks should be minimum 4-foot wide.

Response 7-1:

The comment is acknowledged. This improvement will be incorporated into the project design. It is expected that this or a similar requirement would be made a condition of Tentative Tract Map approval. On September 18, 1998, Ed Howell, District Engineer for the City's West Los Angeles office stated by telephone to the project engineers, that the City may accept a 36-foot roadway in a 54-foot right-of-way for non-continuous streets. The applicant shall incorporate the final specifications required by the City.

Comment 7-2:

2. Sidewalks should have revised plans at the driveway approaches as well as cross section design to accommodate planting areas.

Response 7-2:

The comment is acknowledged. The project applicant shall work with Bureau of Engineering to incorporate the required design into final plans, which is expected to be a condition of Tentative Tract Map approval.

Comment 7-3:

3. Sidewalk shall be required on the south side of Street "B" between Street "G" and 500 feet east of Street "A" subject to further review by the City Engineer. Currently the tentative tract map does not show sidewalk in this location because this is a "single-loaded" street in this segment with homes proposed only on the north side. Sidewalk will not be required on the south side of Street "A". Four foot wide sidewalks should be constructed along both sides of all other streets within the tract boundary.

Response 7-3:

The comment is acknowledged. This improvement will be incorporated into the project design. It is expected that this requirement will be made a condition of Tentative Tract Map approval.

Comment 7-4:

4. Existing roadways adjoining the property on 80th Street and Rayford Drive should be widened to a width of 20 feet half street on the north side with a 4-foot sidewalk to the satisfaction of the City Engineer. A modified outside curb elbow design shall be constructed at 81st Street and Colegio Drive to the satisfaction of the City Engineer (currently this is improved as a future "T"-intersection and there is no room for a full elbow design).

Response 7-4:

The comment is acknowledged. This improvement will be incorporated into the project design. It is expected that this requirement will be made a condition of Tentative Tract Map approval.

Comment 7-5:

5. The proposed storm drain for Tentative Tract No. 51122 shall be connected to the proposed Playa Vista (Tract 49104) storm drain improvements in Lincoln Boulevard. If the Playa Vista improvements do not proceed in a timely manner consistent with the Tract 51122 improvements, the Tract 51122 storm drain will be extended northerly in Lincoln Boulevard to the location of the existing Lincoln Boulevard storm drain outlet. A new storm drain line shall be constructed in Lincoln Boulevard parallel to the existing line for the Tract 51122 drainage.

Response 7-5:

The comment is acknowledged. As stated in the first mitigation measures of Section IV.C.1, Surface Water Runoff/Hydrology of the Subsequent Draft EIR, page 127, "The design of the on-site drainage system shall be submitted to the City Engineer for review and approval prior to development of any drainage system improvements." Thus, final storm drain plans shall be prepared in accordance with the City Engineer's requirements.

Comment 7-6:

6. The final EIR should address available sewer capacity in the sanitary sewer adjacent to the project site.

   The proposed project lots fronting on 80th Street can connect directly to the existing sewer in this street without any diversion if there is sufficient capacity within the existing public sewer. A new sewer line should be constructed in Rayford Drive to serve the project lots fronting this street. The new Rayford Drive sewer can connect to the existing sewer at Rayford Drive/80th Street and Parkhill Drive without any diversion. All other proposed lots within the project will connect to a new on-site tract sewer system that will connect to the existing sewer in Lincoln Boulevard. The Lincoln Boulevard sewer connection may be via a new sewer line from a point in proposed Street "A" crossing under and down the proposed slope north of Street "A" and connecting directly to an existing sewer in Lincoln Boulevard. As an alternative, the proposed on-site tract sewer system may connect with the existing Lincoln Boulevard sewer at the base [*sic*] proposed Street "A" with the construction of a new maintenance-hole at this location. All sewer improvements and connections will be to the satisfaction of the City Engineer.

Response 7-6:

Pursuant to a meeting between the applicant and Mr. Lee Pitman, Civil Engineer, City of Los Angeles Department of Public Works, Bureau of Engineering (West Los Angeles District) on May 21, 1998, and telephone conversations on December 2 and October 29, 1997, Mr. Pitman has indicated there would be sufficient capacity in the adjacent sanitary sewers to accept project flows. The remaining comments are acknowledged for the record and the proposed project will incorporate the requirements set forth in this letter, which are expected to be a condition of Tentative Tract Map approval.

Comment 7-7:

7. Trees should be planted in all on-site and off-site tract boundary [*sic*] per requirements of the Street Tree Division of the Bureau of Street Maintenance.

Response 7-7:

The comment is acknowledged. The appropriate street tree requirements will be incorporated into the project design by the applicant, working with the Street Tree Division of the Bureau of Street Maintenance, and is expected to be made a condition of Tentative Tract Map approval.

Comment 7-8:

8. The cul-de-sac at the terminus of proposed "E" Street is outside of the Tract 51122 tract boundary. This offsite street dedication together with the emergency access from "E" Street to Berger Avenue should be provided in a manner satisfactory to the City Engineer prior to the recordation of any final subdivision map.

Response 7-8:

A revised Tentative Tract Map (No. 51122) was submitted to the City Planning Department in October of 1998 in response to community concerns. Modifications include locating the entire "E" Street cul-de-sac within the project boundary. This area is now proposed to be made an on-site dedication as part of the final subdivision map, see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 7-9:

9. The final EIR should clarify the nature of the proposed trail system as described in the Draft EIR (public trail easement vs. private trail easement). In addition, future maintenance responsibility of this trail system should also be addressed in the final EIR.

Response 7-9:

The project's proposed trail system is intended to be open to public use. In order to accomplish this, it is proposed that the trail system will be offered for dedication to the City of Los Angeles as a public trail easement. If such offer is accepted, the trail system will be maintained by the City of Los Angeles. Alternatively, maintenance responsibility for the trail could be by the project's homeowners association subject to the standards of the City of Los Angeles. The agreement with Playa Vista specifically exclude the pedestrian trail and park areas. These areas would be maintained by the West Bluff's homeowners association.

Comment 7-10:

10. The future ownership and maintenance responsibility of the bluff face within this project area should be addressed in the final EIR.

Response 7-10 :

Please refer to Response 1-2 for discussion of future bluff slope ownership and maintenance responsibility.

The project owner has entered into binding agreements with Playa Capital Company (Playa Vista) whereby Playa Vista will assume ownership and maintenance responsibility of the bluff face. It is intended that Playa Vista or its successors will maintain the bluff face in conjunction with their Playa Vista project open space areas located in the Ballona Wetlands. If Playa Vista does not assume ownership and maintenance responsibility, it will be assumed by West Bluff project's homeowners association.

Comment 7-11:

11. The proposed project will vacate/merge a portion of Hastings Avenue. The final EIR should include the street vacation/merger as part of the discretionary approvals required

for this project. In addition, the final EIR should address any potential impact of this vacation/merger in this area.

Any questions regarding this document should be directed to Mr. Pay Saidi at (213) 485-3091.

Response 7-11:

The Hastings Avenue vacation/merger would occur as part of the Lot Line Adjustment/Merger of Lots which is listed as a discretionary approval requirement for this project (see page 61 of Section II.E, Discretionary Review, in the Subsequent Draft EIR). All existing recorded lots that otherwise would require access from this street are located within the project boundary, under the same ownership, and are proposed to be re-subdivided as part of the project's subdivision map which removes the future need for this street. Actual construction of this portion of Hastings Avenue would be nearly infeasible due to the severe terrain this alignment overlays. This vacation/merger would have no impact on offsite lots as their access will be maintained. There will be no impact to proposed on-site lots because vehicular access will be supplied by a proposed new street system. Pedestrian access is proposed to be supplied to the bluff area as described in the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR. No other environmental impacts would result from the vacation/merger.

LETTER NO. 8
Signed by: Wilbur Takashima for David Leatherman

July 1, 1998

City of Los Angeles
Los Angeles Department of Transportation
221 N. Figueroa Street, Suite 500
Los Angeles, CA 90012

SUBSEQUENT DRAFT ENVIRONMENTAL IMPACT REPORT-WEST BLUFFS PROJECT

Comment 8-1:

This is in response to your letter of transmittal, dated May 21, 1998, which accompanied a copy of the Subsequent Draft Environmental Impact Report (SDEIR) for the West Bluffs Project, Case No. 91-0675-SUB (CDP) (PP) (ZBA). The Los Angeles Department of Transportation (LADOT) has completed a review of the document and submits the following comments:

- Several references to "Manchester Boulevard" are found in this document. The street name is actually "Manchester Avenue". The following pages of the SDEIR contain the erroneous reference:

  pg. 27 (twice), pg. 254 (twice), and pg. 400

Response 8-1:

The required change from Manchester Boulevard to Manchester Avenue is acknowledged and will be incorporated. See Section II of this Subsequent Final EIR, Corrections and Additions to the Subsequent Draft EIR.

Comment 8-2:

- Similarly, numerous references to "Park Hill Avenue" are found in the SDEIR. The street name is actually "Park Hill Drive". The following pages of the document are affected:

pg. nos. 55, 73, 77, 124, 139, 184, 186, 195, 223, 231, 241, 253, 316, 326, 328, 329, 400

Response 8-2:

The required change from Park Hill Avenue to Park Hill Drive is acknowledged and will be incorporated. See Section II of the Subsequent Final EIR, Corrections and Additions to the Subsequent Draft EIR.

Comment 8-3:

- With regard to Section IV. N. 1. (Traffic and Access), LADOT concurs that this project is not expected to result in any traffic impacts at the study intersections nor on the surrounding residential neighborhood streets. As a result, no improvements/ mitigations are required. However, the developer of the project is proposing to voluntarily implement a comprehensive "Neighborhood Traffic Intrusion Program"' (NTIP) that is meant to address existing and potential traffic intrusion problems in the residential neighborhood immediately to the south of the proposed project.

  LADOT has discussed possible NTIP measures with the consultants. There is agreement on some proposed measures. Should traffic circles ultimately be approved, additional right-of-way may need to be dedicated through the tract map approval process along the project frontage on 80th Street.

Response 8-3:

The designs of the proposed traffic circles are currently, and have been previously, reviewed by LADOT Design Division staff. The current designs indicate the need for some additional right-of-way dedications along the project frontage of 80th Street at both Hastings Avenue and Park Hill Drive. The applicant will provide the rights-of-way necessary for implementation of the finalized traffic circles, which is included in the modified Tentative Tract Map.

Comment 8-4:

If the NTIP ultimately becomes a condition of development, then the NTIP must be subject to the approval of LADOT and its policies and procedure. It is also suggested that some form of guaranty be filed with the City of Los Angeles to assure that the NTIP is designed and implemented at no cost to the residents or to the City. Absent any other information, LADOT

recommends that a minimum $300,000 bond or letter of credit be submitted and be in effect for a minimum of five (5) years after the development reaches 90% occupancy.

If there are any questions with regard to the above comments, please call me or Wilbur Takashima of my staff at (213) 485-1062 or (310) 524-8253.

Response 8-4:

The applicant is working with LADOT staff to ensure that the Neighborhood Traffic Intrusion Program (NTIP) conforms with LADOT policies and procedures, both as an overall program and in its individual components. The applicant has volunteered to guarantee NTIP implementation through cash or letter of credit for a total of $300,000 for the Phase I portion of the program, which is currently under review by LADOT, as well as $50,000 for additional measures in Phase II of the program as may be deemed necessary following monitoring of the effectiveness of the Phase I measures. The project traffic consultant recommends that, since most of the proposed development does not use the neighborhood streets affected by the NTIP, that the guarantee be in effect for five years, or until development of the homes fronting on 80th Street is 90 percent complete.

LETTER NO. 9
Signed by: Richard E. Olsen

May 29, 1998

Bureau of Fire Prevention and Public Safety

SUBJECT: DRAFT REQUEST FOR COMMENTS-PROJECT NAME "WEST BLUFFS"

Comment 9-1:

All items of concern to this Department appear to have been addressed adequately at earlier levels of review.

Response 9-1:

This comment stating that the concerns of the Fire Department have been addressed will be forwarded to the decision makers.

E. OTHER CITY AGENCIES

LETTER NO. 10
Signed by: Laurie B. Jester

May 28, 1998

City of El Segundo
Planning and Building Safety Department
350 Main Street
El Segundo, CA 90245-0989
Laurie B. Jester

SUBJECT: Draft Environmental Impact Report, West Bluffs, Reference No. 97111005, EIR Case No. 91-0675-SUB(CDP)(PP)(ZBA)

Comment 10-1:

The Planning Division of the Department of Planning and Building Safety for the City of El Segundo has received a copy of the draft Environmental Impact Report for the West Bluff project. We have reviewed the document, and would like to inform you that we have no comments in regards to it. We look forward to receiving the final document.

Should you have any questions, please feel free to contact me at (310) 322-4670, extension No. 212.

Response 10-1:

This comment is acknowledged and will be forwarded to the decision makers for their review. No response is required.

F. ORGANIZATIONS AND BUSINESS

LETTER NO. 11
Signed by: Christine Balk

June 4, 1998

Christine Balk
80th Street Bluff Association
7742 West 80th Street
Playa del Rey, CA 90293

Comment 11-1:

We are an association of local homeowners dedicated to preserving the Ballona Valley as a nature reserve and historical area. Many of our members have lived in Playa del Rey for over 60 years, many are original families who bought homes raised families contributed to the local economy and have built a family orientated [*sic*] community that respects this incredibly scenic parcel of wetlands.

Even though we have endured the abomination of building on our bluffs for years, namely Veragua Drive, we cannot permit this scarring to go on any further. Open space yes, Cattelus [*sic*] can go make their money on one of their other pure profit endeavors, i.e. the huge property on Artesia Blvd near LAX that bears their name and obviously they bought and now are selling.

When will our local politicians think about the people who have literally built this area with their own hands? Who cares about mega developments when the Marina Del Rey business community is struggling so dramatically with bankrupt developers, starving business and empty real estate galore !!!!! When was the last time someone took a look at what a ghost town our very own Fisherman's Village is empty?? [*sic*]

Please feel free to respond with any questions or comments

Response 11-1:

This comment expresses opposition to the proposed project and to continued development in the area. A discussion of issues related to Plant Life and Animal Life, Land Use, Aesthetics and

Views, and Cultural Resources is found in Sections IV.D, IV.H, IV.S. and IV.T, respectively, of the Subsequent Draft EIR. The concerns of the commentor will be forwarded to the decision makers for consideration of the project proposal.

LETTER NO. 12
Signed by: Jeanne Breunig

July 2, 1998

Westchester Vitalization Corporation
6320 West 84th Place
Westchester, California 90045

Comment 12-1:

At the June 25, 1998 meeting of the Westchester Vitalization Corporation (WVC), Mr. Peter Lauener, Vice President, Catellus Residential Group provided an update of the proposed West Bluffs development. The WVC Board approved a motion to support the proposed West Bluffs development.

The Board is impressed with the concessions made to mitigate existing traffic problems in the West Bluffs adjacent neighborhood, and provide a trail and view park for the use of the adjacent community as well as that of new West Bluffs residents. We feel the construction mitigation measures Mr. Lauener outlined in his presentation will provide recourse for adjacent residents during the construction period. The WVC Board believes this development, with its proposed mitigation measures, will enhance the entire community and provide a much needed single family housing inventory for the City of Los Angeles.

We know the struggle to meet the needs of adjacent residents and balance a property owner's right to develop his property is never easy. We commend Mr. Lauener for his work with the community.

Response 12-1:

This comment will be forwarded to the decision makers for their consideration.

LETTER NO. 13

Signed by: Samantha Christie
Dr. Howard Towner

July 1, 1998

Samantha Christie, M.A. Consultant
Wetlands Information and Planning Services
Friends of Ballona Wetlands
Dr. Howard Towner
Professor of Biology, Loyola Marymount University
Member, Board of Directors, Friends of Ballona Wetlands
6953 Trolley Way
Playa del Rey, CA 90293

Comment 13-1:

Position Statement

Friends of Ballona Wetlands has been working since 1978 to protect and restore the Ballona Wetlands in Playa del Rey. Because the proposed 120-home project near Hastings Canyon adjoins the Ballona Wetlands, we have a strong interest in how it impacts those wetlands. Furthermore, we also have an interest in any remaining open space in the Westchester-Playa del Rey region, and in the intrinsic habitat values of this space.

The site of the proposed 120-home development in Hastings Canyon has intrinsic environmental value in the coastal sage scrub community living at the top of the bluff. It could have even higher habitat value if the top of the bluff was restored to its original condition. Further, because of the site's proximity to the Ballona Wetlands and the newly created 34-acre freshwater marsh, development there has an intimate relationship to the ecology of that freshwater marsh, and that of the existing salt marsh.

Response 13-1:

As stated in Section IV.D, Plant Life and Animal Life, of the Subsequent Draft EIR, the majority of the coastal sage scrub remaining on the 44-acre project site is found on the bluff slopes. The bluff top field no longer supports sage scrub, due to ongoing disking activities,

and is dominated by ruderal species; similarly, Hastings Canyon contains only isolated patches of coastal sage scrub. Moreover, this plant community was observed to exhibit poor health and vigor across the project site. Project implementation would result in the preservation of the bluff slopes and restoration of the coastal sage scrub community, as stated in Section II.C, Statement of Objectives, on page 52 of the Subsequent Draft EIR, and in accordance with the *Bluff Area Stabilization and Maintenance Program*, which is included as the final item in Appendix F, Biological Resources Reports, in Volume 2, Technical Appendices.

With regard to the proximity of the project site to the Ballona Wetlands, the ecological and hydrological relationships between the two habitats are acknowledged in Section IV.D, Plant Life and Animal Life, and Section IV.C.1, Surface Water Runoff/Hydrology, of the Subsequent Draft EIR, respectively. The *Bluff Area Stabilization and Maintenance Program* is intended to accomplish slope stabilization and related erosion control objectives, in addition to enhancement of biological resource values associated with the coastal sage scrub community. For these reason, project implementation is anticipated to represent a beneficial impact with regard to on-site habitat as well as the existing and proposed wetland habitat below.

Comment 13-2:

While the Friends' most desirable alternative is to restore both the bluff and the top of the bluff face to a state approximating its original condition and leaving it as valuable open space, this position statement outlines 1) the environmental impacts the proposed project will undoubtedly cause, and 2) various recommendations to Catellus to minimize these impacts, pursuant to the completed Environmental Impact Report (EIR). These suggestions are a culmination of several meetings the Friends have had with Peter Lauener, Vice President of Catellus, and Mike Russell, Vice President of Howard Hughes Corporation. Please note that a separate document will be sent to Catellus, Howard Hughes, and the City with specific comments regarding the latest EIR.

Environmental Impacts of the Project:

Dr. Howard Towner is a biology professor at Loyola Marymount University. His qualifications include a Ph.D. in biology from Stanford University with a specialty in ecology and evolution, and 25 years of experience with the proposed project site. A resident of Westchester, Dr. Towner has extensive knowledge of the bluffs, and their biota. He has sampled and examined the bluff plants and vertebrates many times. The following illustrates his comments regarding the environmental and ecological impacts of the proposed project.

Response 13-2:

These comments are acknowledged for the record and will be forwarded to the decision makers for their review and consideration in reviewing the project proposal.

Comment 13-3:

The proposed project, if implemented by the developer, will have a variety of ecological impacts on the site itself as well as the surrounding area. Several of these impacts will be severely negative. Some may be positive:

1. There will be a permanent major negative impact on the bluff top itself, the primary site to be utilized for the construction of homes and supporting infrastructure. The area is currently an abandoned field. However, over the years, the area has frequently supported ruderal vegetation and a fauna of native animals.

a) One matter of serious concern is that the site has served as a foraging ground for a wide variety of raptors, some of which are "listed" and other are of "special concern." These raptors include the species listed below, all of which Dr. Towner has observed personally on the project site. The foraging area for these species will be drastically reduced if the project is implemented as proposed.

Birds Observed:

Prairie Falcon
Peregrine Falcon
American Kestrel
Black-shouldered Kite
Red-tailed Hawk
Northern Harrier
Turkey Vulture

Response 13-3:

It was acknowledged that the project site represents known or potential habitat for sensitive raptors and other sensitive wildlife species in Section IV.D, Plant Life and Animal Life, of the Subsequent Draft EIR, as well as in previous biological resource survey reports contained in

Appendix F, in Volume 2, Technical Appendices, of the Subsequent Draft EIR. However, the project site is utilized predominantly for foraging purposes by the birds observed and reported, and was not observed or reported to support any nesting or otherwise resident sensitive wildlife species. The majority of the sensitive bird species observed or reported on-site are not formally listed as endangered, threatened or rare and are, therefore, afforded no legal protections. Moreover, the raptor species cited by the commentor do not forage exclusively in grasslands or ruderal fields, but are known to frequent a range of habitats, including scrub and brushlands, marshlands, riparian woodlands and cultivated lands; thus, the project site does not represent critical habitat for these species.

Comment 13-4:

The following predatory birds occur regularly, to infrequently in the Westchester region, but are very likely to use the site:

Great-horned Owl
Barn Owl
Burrowing Owl
Cooper's Hawk
Sharp-skinned Hawk
Red-shouldered Hawk

The project site is the last remaining local upland foraging area with flat terrain. For the species above, loss of this habitat cannot be mitigated. The best alternative environmentally for this space would be to allow it to return to a community of native vegetation or enhance it with plantings of natives.

Response 13-4:

Please refer to Response 13-3 for discussion of habitat values of the project site for raptors. While the bluff top terrain is unique in the project area, the habitat it represents is not critical for survival of the species cited by the commentor. Moreover, project implementation is planned to include restoration and enhancement of the bluff slope coastal sage scrub community, improving habitat resource values over an area of 14.7 acres. Planning Consultants Research biologists, preparers of the previous biological reports for the site, and regulatory agencies all concur that the bluffs represent the highest quality habitat on-site, as

well as crucial habitat for the adjacent Ballona Wetlands, and this is why habitat mitigation measures and preservation and restoration efforts are focused on this area.

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 156126 (d), an EIR is required to "describe examine a range of alternatives...which would feasibly attain the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives." As stated in Section VI, Alternatives (No Project Alternative), retention of the project site as undeveloped open space would not meet project objectives.

Comment 13-5:

b. A number of local birds utilize flat, open spaces and are likely to be extirpated if the development is implemented as proposed. These species are not likely to survive in the restored bluff face habitat, since it will be steep and brushy. These species require grassy areas. Such species include:

Western Meadowlark
Say's Phoebe
Horned Lark
Lark Sparrow

Response 13-5:

Please refer to Response 13-3 for discussion of habitat values of the project site for raptors and other birds. While the bluff top terrain is unique in the project area, the habitat it represents is not critical for survival of the species cited by the commentor. With the exception of the California horned lark, a state and federally-designated Species of Concern, the birds cited by the commentor do not represent sensitive species and are abundant in the region and/or throughout California in a variety of habitats. Moreover, the ruderal and non-native grassland vegetation found on the bluff top are not considered sensitive plant communities, nor are they unique to the region. Project implementation is planned to include restoration and enhancement of the bluff slope coastal sage scrub community, improving habitat resource values over an area of 14.7 acres (including Cabora Drive). Coastal sage scrub communities typically contain a grassland component and would serve as potential habitat for the bird species cited.

Comment 13-6:

c. A variety of terrestrial vertebrate species will be adversely affected by the development. The potential local range of these species will permanently be shrunk. While most of these species are not rare or endangered, many are in danger of local extirpation. These vertebrates are not only of intrinsic interest and value, but also constitute food for the raptors previously mentioned. Listed below are terrestrial vertebrates which Dr. Towner observed on the bluffs, or which are likely to occur on the site:

Amphibians observed:

Pacific Tree Frog (*Pseudacris regilla*)
Western Toad (*Bufo boreas*)
Black-bellied Salamander (*Batrachoseps nigriventris*)

Reptiles observed:

California Legless Lizard (*Anniella pulchra*)
Western Fence Lizard (*Sceloporus occidentalis*)
Side blotched Lizard (*Uta stanshuriana*)
Southern Alligator Lizard (*Elgaria multicarinata*)
Western Skink (*Eumeces skiltonianus*)
California King Snake (*Lampropeltis getulus*)
Gopher snake (*Pituophis melanoleucus*)

Mammals observed:

Virginia Opossum (*Didelphis virginanus*)
Pocket Gopher (*Thomomys bottae*)
California Ground Squirrel (*Spermophilus beecheyi*)
Black-tailed Jackrabbit (*Lepus californicus*)
Audubon's Cottontail (*Sylvilagus auduboni*)

Mammals likely to occur at the site:

Striped Skunk (*Mephitis Mephitis*)
Red Fox (*Vulpes vulpes*)-(introduced)
Deer Mouse (*Peromyscus maniculatis*)

Response 13-6:

The function of the project site as known or potential habitat for common and sensitive wildlife species is acknowledged in Section IV.D, Plant Life and Animal Life, of the Subsequent Draft EIR, as well as in the previous biological resource reports included in Appendix F, Biological Resources Reports, in Volume 2, Technical Appendices. However, the majority of the species cited by the commentor are commonly found in the region and are not formally protected by the Endangered Species Act. Moreover, many of the species listed would be expected to utilize coastal sage scrub habitat present along the bluff slopes, which is proposed for restoration and enhancement, and could thus benefit from project implementation. The remainder of the species cited, while considered sensitive, are not formally listed as endangered, threatened or rare and, therefore, are not subject to legal protections or requirements concerning retention of habitat.

One species cited, the Pacific tree frog, is an aquatic amphibian and requires standing or running water for habitat; no such habitat exists on the project site and the species would be expected to occupy the off-site Ballona Wetlands and adjacent bluff slopes. Similarly, the western toad is generally found near streams or wet meadows and no suitable habitat exists on the project site. The black-bellied salamander typically utilizes scrub habitat in addition to grasslands, and removal of the bluff top ruderal and grassland vegetation would not represent a substantial impact on this species.

Comment 13-7:

2. The bluff top represents the last local open space of its type in the general region. It has excellent potential for use as a public space, (e.g. a park or other natural area). a [*sic*] series of developments east of Lincoln Boulevard have consumed all other remnants of this type of landscape. The small amount of space (2.1 acres) dedicated for public use by the proposal is not adequate. If the development is permitted, a requirement for more dedicated open space should be administered. The Friends are in concurrence with the West Bluffs Steering Committee, as well as the majority of the community-at-large concerning this issue.

Response 13-7:

As discussed in the Section IV.O, Parks and Recreation, of the Subsequent Draft EIR (page 290), the amount of park land required under Section 17.12 of the Municipal Code for the proposed project is 2.1 acres, or 4.7 percent of the gross subdivision area. The project as

proposed in the Subsequent Draft EIR would provide 1.01 acres of park/recreation space and preserve 15.74 acres of open space, to be revegetated and enhanced with native plant material. The Subsequent Draft

EIR determined that the proposed 1.01 acres of park/recreation space would only partially satisfy the park space goals established in the Los Angeles Municipal Code and additional park/ recreational elements or in-lieu fees would be required. If the project is approved, the decision makers may require additional land dedication, the provision of private park space for residents, or the payment of in-lieu fees (or a combination thereof), as mitigation for project-related impacts on parks and recreational resources.[3]

After distribution of the Subsequent Draft EIR, the project applicant submitted minor project modifications to the City in October of 1998 in response to community concerns. These modifications were designed to increase the amount of dedicated open space, improve the proposed trail system and reduce the total number of residential lots from 120 to 119. The proposed changes result in an increase in total dedicated open space from 16.75 to 17.33 acres, including an increase in park/recreational space from 1.01 acres to 1.96 acres. These changes are shown in the following revised project open space table, and included in Section II, Corrections and Additions to the Subsequent Draft EIR. Although the proposed changes to the Tentative Tract Map increase the amount of dedicated park/recreational space, it would not meet the established park space goals. Therefore, the project may also be required to pay in-lieu fees in accordance with City of Los Angeles Parks and Recreation Department requirements.

Comment 13-8:

3. The proposed treatment of the bluff face (i.e. restoration of the coastal sage community) is generally commendable and, if properly carried out, should result in the enhancement of that habitat. Currently, this area is degraded and has a high number of weedy, exotic plants. However, it supports a biota that includes some native species of plants, vertebrates, and invertebrates. Restoration of this habitat must be implemented with great care and a minimum of disturbance to existing species i.e. with no extensive terracing or grading. This approach seems to have adopted [*sic*] by the developer and deemed permissible by the City of Los Angeles.

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[3] *City of Los Angeles Recreation and Parks Department staff in meetings with the applicant indicated that due to the relatively small amount of park land that the City can require for this project pursuant to adopted City Codes (2.1 acres), they would prefer payment of in-lieu fees.*

REVISED PROJECT OPEN SPACE TABLE

Open Space Element	Tentative Tract Lot No.	Originally Proposed Acreage	Revised Project Acreage
View Park	Lot 125	0.33 acres	0.32 acres
Pedestrian Trail [a]	Lots 120, 122, 125, 127, 128, and 130	0.68 acres	1.64 acres
Park/Recreation Element Subtotal		**1.01 acres**	**1.96 acres**
Other Open Space	Lots 121, 123, 124, 126, 129, and 131	15.74 acres	15.37 acres
TOTAL		**16.75 acres**	**17.33 acres**

[a] *Acreage includes entire lot area.*

Source: Robert Bein, William Frost & Associates and Planning Consultants Research, 1998.

Response 13-8:

These comments are acknowledged for the record and will be forwarded to the decision makers for their review and consideration in reviewing the project proposal.

Comment 13-9:

4. The inclusion of a direct access road to Lincoln Boulevard will destroy the natural aspect of that part of the bluff face. It will also isolate a small area to the south of the street from the natural areas on the rest of the bluff face. This represents a considerable negative ecological impact (see additional information and recommendations for the proposed street (A) in the "Drainage and Runoff" section of this document).

This aspect of the project also provides direct access from Lincoln Boulevard, which may have adverse impacts on neighborhood safety and crime levels.

Response 13-9:

The small portion of the bluff slope which would be isolated by construction of Lincoln Boulevard access represents the eastern terminus of the bluffs and resource values are correspondingly lower than on the remainder of the bluff. In addition, the Subsequent Draft

EIR included analysis of eliminating direct access of the project site to Lincoln Boulevard (i.e., Alternative 2: Alternative Access (No Access From Lincoln), Section VI, Alternatives). As stated on page 399 of the Subsequent Draft EIR, implementation of this alternative would only have a slightly reduced impact on biological resources, as the grading footprint would be similar to that of the proposed project and would result in a similar loss of existing vegetation, and the loss of CDFG-regulated streambeds and Corps-regulated wetlands and "other waters." Moreover, other impacts (i.e., transportation and circulation issues) would be increased as compared to the proposed project with elimination of "A" Street. In accordance with CEQA Guidelines Section 15126 (d), an EIR is required to focus on alternatives which could reduce project-related impacts to less than significant levels. As the proposed project would not result in increased impacts to biological resources, and implementation of the this alternative would not reduce significant impacts, but would result in significant impacts to transportation and circulation issues, this alternative was not designated as the environmentally superior alternative.

As stated in the Subsequent Draft EIR (Section IV.O.2, Police Protection), no significant police protection impacts would occur with implementation of the proposed project, which includes providing direct access from the project site to Lincoln Boulevard. Therefore, no significant impacts are anticipated with regard to neighborhood safety and crime levels.

Comment 13-10:

5. A major concern with any development proposed for the bluffs is its potential impact on the Ballona Wetlands, which occupy the land below the bluff. Specific concerns include street runoff, pollutants in runoff, noise, lighting and unconfined pets (dogs and cats) which may disturb or prey upon native species.

The issue of water runoff appears to have been dealt with fairly satisfactorily in the developer's proposal to direct it way [*sic*] from the bluff face and treat it at the entrance to the freshwater marsh area of the wetlands. This will reduce the potential for bluff erosion as compared to present conditions and represents a positive impact of the project (see additional information and recommendations for runoff in the "Drainage and Runoff" section of this document).

Pollutants in the runoff emanating from people's homes, yards and streets (pesticides, fertilizers automobile oil, etc.) will hopefully be dealt with using the most advanced technology

available (i.e. BMP Catch Basins to filter these pollutants). Perpetual monitoring of the quality of this runoff should be a requirement for the development permits.

To minimize disturbance of wetlands, wildlife, lighting and noise mitigation should be implemented and enforced in perpetuity.

Response 13-10:

These comments are acknowledged for the record and will be forwarded to the decision makers for their review and consideration in reviewing the project proposal. Please refer to Sub-sections 2.c, Project Impact, and 4, Mitigation Measures, of Section IV.C.1, Surface Water Runoff/Hydrology, as well as Appendix E, Hydrology Report, included in Volume 2, Technical Appendices, of the Subsequent Draft EIR, for discussion of project storm water drainage plans, including Best Management Practices (BMPs) and other relevant requirements. Additionally, please refer to Section IV.A.1, Grading, for discussion of mitigation measures addressing storm water quality. As stated in mitigation measures included in the Surface Water Runoff/Hydrology section, BMPs to be implemented include runoff catch basin filters in 13 on-site and 5 off-site catch basins, as well as funding and development of an ongoing catch basin maintenance program.

Consistent with the requirements of the CEQA Guidelines, Section 15124, and as stated in Appendix A, Mitigation Monitoring Program, in Technical Appendix Volume 1, the duration of mitigation monitoring (i.e., monitoring phase) depends on the nature of the mitigation measure. With regard to grading and surface runoff water quality, mitigation monitoring encompasses the pre-construction and construction phases as potential for water quality impacts from erosion and sedimentation are greatest during this period. Mitigation measures addressing noise impacts and aesthetics (off-site light emissions) similarly encompass the pre-construction and construction phases. Monitoring of project operations in perpetuity is neither feasible nor necessary, as compliance with mitigation measures would be achieved during project construction.

Please refer to Sections IV.D, Plant Life and Animal Life, and IV.F, Noise (Construction, Mobile and Stationary) for discussion of potential project construction and operational impacts, and mitigation measures related to domestic pet intrusion and noise impacts. Project-related light emissions and glare generation were determined not significant in the Initial Study; however, as stated in a mitigation measure in Section IV.S, Aesthetics and Views, all lighting

shall be directed onto the site and "cut off" street lighting fixtures would be used throughout the project site to minimize off-site light emissions.

Comment 13-11:

The negative effects of domestic animals on the wetlands are probably unmitigable. Restrictions on pet ownership are onerous and unenforceable. Dogs can be controlled within fences, but cats are more likely to roam free [*sic*] Thus, there will be a definite negative impact from this source. In addition, it has been indicated that Catellus plans to provide vermin control in and around the site throughout the construction process. Vermin control requires the use of pesticides, detrimental to the biological communities of the area. The use of pesticides should be strictly monitored, and avoided whenever possible, to minimize impacts on the surrounding wetlands.

To summarize these impacts, in spite of various well-designed mitigation measures (bluff face restoration and runoff treatment), the proposed project will have an overriding negative impact on the ecological health of the site proper and the surrounding regions.

Response 13-11:

Vermin control by the applicant is proposed as part of the Applicant's Required Construction Practices which would be enforced and monitored through the project Mitigation Monitoring Program. The Construction Practices require that a vermin abatement program be submitted to the community for input prior to construction activities. Please see Section II, Corrections and Additions to the Subsequent Draft EIR.

It is acknowledged in the Cumulative Impacts discussion in Section IV.D, Plant Life and Animal Life, of the Subsequent Draft EIR, that project implementation would potentially result in direct impacts to the project site and Ballona Wetlands related to the loss of local natural resources, unauthorized use of the project site by humans and domestic animals; however, the project site is located within an already urbanized area and, as such, represents "infill" development. Additionally, due to the highly disturbed nature and correspondingly low habitat resource values of the project site, project implementation is not considered to have a potentially significant impact on biological resources. The sole sensitive plant community present on the project site, Diegan coastal sage scrub, is largely confined to scattered patches across the bluff slopes, which are proposed for preservation and restoration. This represents a

net increase in acreage of this community following plant community and a positive impact with regard to habitat resource values.

Comment 13-12:

Recommendations:

While the Friends' most desirable alternative is to see the bluff top and face restored and left as natural open space, the following illustrates some recommendations for the proposed development site with respect to the issues of terracing, setback from the edge of the bluff top, open space, drainage and runoff, and the inclusion of EIR appendices which may have omitted observation evidence of rare and unusual fauna existing on the site.

TERRACING:

Since the bluff in question is at approximately at 30-40 degree slant, it is necessary to stabilize the slope for liability reasons. Originally, Catellus proposed to terrace the bluff, to stabilize the slope. The Friends' position on this was absolutely negative. We will not tolerate this proposal, because there is no need for such extreme unnatural grading. The small animal fauna of the area would be greatly disturbed, if not wiped out with the terracing. The evidence supporting this is that other places on the bluff (where the UCLA housing project was built) were not terraced, and coastal sage vegetation was planted on the bluff. It proves that terracing is unnecessary. Catellus has claimed that with the Kentwood Collection Project, native plants were replaced during the building process. However, this was not really effective, because the bluff was scraped clean in order to put the coastal sage vegetation in-this upset [*sic*] the small animal fauna, and the restoration of the area was never complete.

Response 13-12:

The project proposal includes retaining a majority of the bluff face area as natural open space (see Section II.D, Project Characteristics, on page 52 of the Subsequent Draft EIR) and implementation of a *Bluff Area Stabilization and a Maintenance Program* (see Appendix F of Technical Appendix Volume 2). The proposed project would avoid "terracing" in the areas to be left natural. It is the intent of the project applicant to employ a certified landscape architect to assist in the landscaping and revegetation of the bluff face, as suggested in Comment 13-13, below.

Comment 13-13:

OUR SOLUTION: No grading it all, except where it is absolutely necessary to correct ravines for erosion control. The planting of native plants among already existing vegetation will lessen the impact on the small animal fauna of the area, as there do exist uncommon species of vertebrates that add to biodiversity of the area and are part of the wetland ecosystem. The native plants mixed with already existing vegetation will also leave the bluff as natural as possible, and will help prevent erosion. Catellus has agreed to scale back terracing of the bluff face to what is only necessary for erosion control, and received approval for a 'no-grading' policy on the bluff face. The Friends agree with Peter Lauener's suggestion to employ Doug Campbell to landscape the bluff face-his expertise on native plant usage is satisfactory for the project.

Response 13-13:

These comments regarding no grading on the bluff face, except where necessary, and habitat restoration are noted and will be incorporated into the project. Further as stated in Response 13-7, after distribution of the Subsequent Draft EIR, the applicant submitted modifications to the proposed project. As part of those modifications, the proposed trail down the bluff face to Cabora Drive has been eliminated to reduce impacts to the bluff face.

Comment 13-14:

THE SETBACK:

According to law, the homes must be built at least 15 feet from the edge of the bluff. Catellus has proposed building fences behind the homes. The total proposed acreage for the project is 44 acres, including yards, parkways.

OUR SOLUTION: The Friends' position on this is also environmentally sensitive. We recommend the setback to be at least 100 feet from the edge of the bluff. This would ease the burden on the bluff, and leave at least *some* of the native vegetation and bluff structure alone. This issue has yet to be resolved--Catellus has proposed that the setback will occur at varying lengths from the edge of the slope to account for differences in lot size. Evidently, the setback will range from 65-110 feet from the edge of the bluff (with yards) and 50-85 feet from the edge of the bluff without yards. The Friends maintain their position that a larger setback will help protect the top of the bluff as well as the native flora on the bluff face.

Response 13-14:

The proposed project setback from the edge of the bluff to the proposed homes (with yards) on Lots 1 through 27 will range from 45 to 90 feet, with an average setback of more than 65 feet. This setback will range from 30 to 75 feet from the bluff edge to the back of the residential lots, which is greater than for any other residential development in the area. These setbacks were found to be adequate from a geotechnical standpoint pursuant to reviews made by the Geotechnical Engineering staff, Bureau of Engineering, Department of Public Works and Geotechnical Engineering staff of the Department of Building and Safety of the City of Los Angeles as indicated in Interdepartmental Correspondence dated April 17, 1998 and June 2, 1998 respectively. However, this comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 13-15:

OPENSPACE:

The issue of open space is an important one, especially to an already overpopulated area as the proposed site. Currently, only 2.1 acres of open space has been set aside by Catellus for public open space. The West Bluffs Steering Committee and the Friends of Ballona Wetlands concur that more open space, for parks and recreation is needed for the community-at-large. Catellus has decreased the amount of housing units by merely one unit (121 to 120). This is unacceptable, both to the Friends, and the majority of the surrounding community.

SOLUTIONS: The Friends feel that at least 10 acres should be set aside, either for parks and recreation areas, or left alone as open space. Currently, Catellus claims that over 40% of the project is open space. However, this includes the bluff face, which does not provide terrain for parks or recreational space.

Response 13-15:

As stated in Response 13-7, the applicant has proposed modifications to the project which includes a total of 17.33 acres of open space. The 2.1 acres mentioned by the commentor is the amount of park land required of the proposed project in accordance with Municipal Code Section 17.12, as discussed in Section IV.O, Parks and Recreation (pages 290-291) of the Subsequent Draft EIR. Although the amount of recreational land does not meet the 2.1-acre goal stated in the City's Municipal Code, the proposed project does provide 1.96 acres of

park/recreation space and 15.37 acres of other open space for a total of 17.33 acres, which exceeds the 10 acres requested by the commentor. (These calculations have been slightly modified with revisions to the project. See revised Table 45 in Section II, Corrections and Additions to the Subsequent Draft EIR.)

Comment 13-16:

DRAINAGE AND RUNOFF:

Catellus has proposed a parallel pipeline to be built under a new road (Street A) that would run parallel to Lincoln Blvd., and a new storm drain would be built. This supposedly would keep more runoff away from the wetland areas. Catellus indicated that computer generated images showed Street A to be hidden from view when seen from the surrounding freshwater marsh, underneath the proposed project. However, the Friends are not concerned with the view from the marsh. We are concerned with the road cutting right through the bluff, and forcing fauna to traverse a concrete road used by vehicles. This is unacceptable. Not only is Street A cutting through a viable, natural ecosystem, but the threat to small fauna and other wildlife is disproportionate to the benefits of building the road. Although the pipeline will carry project runoff to Lincoln Blvd. under the road [*sic*], The Friends *oppose the road altogether,* because it would have to come right down the bluff. This would disrupt all current ecosystems. The area was shown to have 69 CFS-with the new project, the water entering the freshwater marsh would increase by 20% to 85 CFS. This is not a significant increase, but these figures are contingent upon the water first being diverted in this parallel pipeline.

Response 13-16:

The project proposes a new storm drain line in proposed"A" Street. This line would connect to a proposed new storm drain line in Lincoln Boulevard that would parallel the existing storm drain line in this street. These storm drain lines would divert drainage from flowing over the bluff top and down the bluff or from flowing into the existing neighborhoods to the south. The storm drain in Lincoln Boulevard will outlet into the Ballona Wetlands west of Lincoln Boulevard via either the existing storm drain outlet or the proposed Playa Vista project storm drain improvements. Preliminary calculations have found that 124 CFS would be the estimated peak flow rate from the proposed "A" Street storm drain line into the proposed Lincoln Boulevard storm drain line. See also Response 13-9 and 13-11 for a discussion of impacts resulting from the construction of "A" Street across the bluff slope.

Comment 13-17:

OUR SOLUTIONS: The Friends definitely support the pipeline, because it would help prevent runoff from dumping directly into the freshwater marsh. (It is unavoidable that the runoff will eventually run into the marsh, but at least it will be diluted, and under the bluff). The pipeline should be placed under a ditch, covered with native vegetation that will help support the natural ecosystem, and help prevent erosion. We definitely also recommend the filtering of water twice. If this is done, the catch basins at Lincoln Blvd. *must be changed every 6 months* with strict monitoring. A possible solution that would help fauna trying to cross over Street A, is to build a culvert under the road, that would allow animals pass under, [*sic*] not interfering as much with the current ecosystem. The culvert would be approximately 4-6 feet wide, 1 foot high. Since the proposed Street A has a 40-60 foot right-of-way, the culvert would be sufficient width-wise to support passing animals. Unfortunately, the current EIR does not include any reference to this proposed solution (the building of the culvert), despite the fact that building Street A will have a severe negative impact on the ecology of the bluff face. We realize that most community members support Street A, to prevent traffic from being diverted through various neighborhoods. Biologically, however, Street A *is detrimental* to fauna trying to cross this busy street, and without an alternative, will most likely be extirpated from the site.

Response 13-17:

Please refer to Response 13-9 for discussion of impacts resulting from the construction of "A" Street across the bluff slope.

All catch basins on the proposed project storm drain system are proposed to include filters. A program for monitoring and cleaning the filters will be included as part of the project. The project engineer has studied the animal culvert proposal under "A" Street. The culvert would need to be approximately 120 feet long in order for its northerly entrance to daylight on the bluff face and therefore be accessible. No reasonable solution was found for making the south end of the proposed culvert accessible. The reason for this is that the base of slope on the south side of "A" Street terminates immediately at the edge of this street right-of-way. There is no reasonable way to outlet this end of the culvert. It would be 6 to 8 feet under the proposed grade at this point and would require extensive additional grading, retaining walls and ramping to make it animal accessible. The slope on this side was brought directly to the edge of "A" Street in the first place in order to minimize the amount of grading.

Comment 13-18:

EIR APPENDICES:

Upon reviewing the DRAFT environmental report for the project (1993), some crucial sections of the appendices are missing from the report. They are X.A. 3-7. X.A.3 was completed in 1992, and X.A. 4-7 were completed in 1989. These sections include a sensitive species inventory, and a biota report of the Hastings Canyon area. These are crucial to the proposed Catellus project, because it shows the diversity of the surrounding ecosystem, and the evidence of uncommon vertebrates, and other small animal fauna. It is also crucial, because it shows potential habitat scenarios, not merely what currently exists on the site. In order to accurately complete an EIR process, *more* than just the current scenario must be included.

Response 13-18:

The documents cited by the commentor as missing from the 1993 Draft EIR are appended, in full, to that EIR as Appendix XA.3 through X.A.7, inclusive. Furthermore, the same documents are included in this Subsequent Draft EIR as Appendix F, Biological Resources Reports, in Volume 2, Technical Appendices, in order to facilitate review. This Subsequent Draft EIR incorporates the 1993 EIR by reference and, accordingly, Section IV.D, Plant Life and Animal Life, summarizes and references information contained in the 1993 Draft EIR.

As stated in Section IV.D in the Subsequent Draft EIR, five biological resource surveys have been performed on the project site over the past nine years, most recently in 1997, together with several site surveys conducted by the US Fish and Wildlife Service (Service), California Department of Fish and Game (CDFG), and US Army Corps of Engineers (Corps) personnel. Where habitat evaluations indicated the potential presence of sensitive species, surveys were accordingly conducted in the appropriate times of year; no surveys were conducted where habitat evaluations led to determinations that conditions were not suitable to support a species or community. The surveys and reports constitute a comprehensive investigation of on-site resources. As these reports are included in Appendix F, Biological Resources Reports, in Volume 2, Technical Appendices, and include comprehensive species lists for the project site and additional information regarding site resources, this information is not repeated in the Subsequent Draft EIR. The conclusions reached by the report authors and regulatory agency field investigators, as well as those contained in the Subsequent Draft EIR, are in substantial concurrence with regard to on-site resources.

With regard to EIR consideration of "more than just the current scenario," the biological resource reports were prepared by qualified biologists and wetland ecologists and based on field investigation and consultation of authoritative information sources, upon which conclusions are drawn regarding past and potential presence or absence of sensitive resources on the project site, as well as addressing existing conditions. Nevertheless, Section 15125 of the CEQA Guidelines provide only that "[a]n EIR must include a description of the environment in the vicinity of the project, *as it exists before the commencement of the project*, from both a local and regional perspective," clearly indicating that contemporaneous physical conditions on and around the project site are properly the scope of an EIR.

Comment 13-19:

OUR SOLUTION: Although the new EIR was issued approximately two weeks ago, and the DRAFT EIR was approved by the City of Los Angeles in June, 1994, further discussion on the impact the project would have on small fauna of the area is essential for a fair and accurate inventory on the species present in Hastings Canyon. The Friends feel this is unacceptable for the project to continue without the issuance of these indices. It is necessary for everyone to know the impact the project will have on the uncommon, yet observed fauna of the area. In addition, the Friends feel it is inadequate to analyze the biota of an area based solely on present conditions. As stated above, Dr. Towner has observed many different species of birds and other wildlife that use the site for foraging and breeding purposes. More attention needs to be paid to potential habitat values, as these increase in importance as open space in the area shrinks from surrounding urban development.

Response 13-19:

Please refer to Response 13-18 for discussion of the adequacy of the Subsequent Draft EIR with regard to analysis of biological resources, and Responses 13-3, 13-5 and 13-6 for discussion of the presence or absence of sensitive and common wildlife species on the project site.

Comment 13-20:

The Friends realize that the development of this site involves other issues, namely, traffic, noise, pollution, safety, etc. But since we are an environmental organization, this position statement has evaluated the project in terms of its environmental impact on the top of the bluffs, the bluff face, and the Ballona Wetlands. As this period of public review will come

to a close in mid-June, the Friends ask that you carefully review this document, acknowledging not only Dr. Towner's 25 years of experience analyzing the flora and fauna of the area, but also the Friends' 20 years of experience and expertise working to protect and restore the last remaining wetland in Los Angeles County--a wetland that exists in direct proximity to the proposed Catellus site.

Thank you for your time and consideration. The Friends would like to thank both the Catellus Residential Group and the Howard Hughes Corporation for their outreach efforts to the community and for their recognition of the environmentally sensitive nature of this unique location. We look forward to working together in the best interests of the community, and the Ballona Wetlands.

Response 13-20:

This comment will be forwarded to the decision makers for their consideration.

LETTER NO. 14
Signed by: Craig S. Eggers

West Bluffs Steering Committee

Subject: West Bluffs Project, Subsequent Draft Environmental Impact Report, EIR No. 91-0675, State Clearinghouse No. 92014046

Comment 14-1:

On behalf of the West Bluffs Steering Committee (WBSC), I am pleased to submit the Committee's response to the Subject: **Environmental Impact Report No. 91-0675**.

As you know, the West Bluffs Steering Committee is a representative group of residents from the immediate surrounding neighborhoods that border the proposed West Bluffs Development. The WBSC includes representatives from 80th Street, Rayford Drive, 81st Street, 82nd Street and 83rd Street who represent the community primarily to the area south of the proposed development. Residents of Colegio Drive, Rayford and 83rd Street represent the community to the east. The residents of Veragua Street, Berger Avenue, 79th Street and 80th Street represent the community to the southwest. (See the attached List of Committee Members)

Although individual residents, including individual members of this committee, may raise issue with certain aspects of the proposed West Bluffs Development, the Steering Committee as a group appreciates and realizes the concessions and compromises which have been made between the developer and the community. Further, we feel that the proposed development strives to be as compatible as possible with the surrounding community.

As such, subject to acceptance and implementing the additional modifications as recently agreed to by the developer and contingent upon inclusion of the Pedestrian Trail as described (see the attached Exhibit One), the **West Bluffs Steering Committee supports the development as proposed**.

Please review this document for specific inclusion in the final EIR document. If you have any questions call me at my office at (310) 822-5351.

I look forward to hearing from you in the near future.

Response 14-1:

This comment will be forwarded to the decision makers for their consideration.

Comment 14-2:

West Bluffs Steering Committee
Exhibit One

PARK-LIKE, OPEN SPACE-AT COLEGIO, PARK HILL, HASTINGS & 79th STREETS

- Emergency entrance at 79th Street-convert the three lots at this location into a usable park-like open area that will serve the dual purpose of an emergency access and community open space. The city and the developer will work with residents on the specific designs for the entrance.

Response 14-2:

The applicant submitted a modified Tentative Tract Map to the City Planning Department in October of 1998. The modified tract map now includes the entire "E" Street cul-de-sac within the boundary of the map. An open space lot, Lot 130, would be formed at this location and included in the tract map. As compared to the design presented in the Subsequent Draft EIR, the "E" Street cul-de-sac has been shortened, so that it terminates northerly of open space Lot 130, creating 11,985 sq.ft. of open space at this location. The 20-foot wide emergency access easement would be included in this open space area. In addition, open space Lot 120 is now proposed between proposed Lot 50 and the project boundary. These two lots are now proposed to be made an on-site dedication as part of the final subdivision map. See the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 14-3:

- Park Hill Avenue and Hastings Avenue-For each location's intersection with 80th Street provide a *minimum* 100' wide by a typical lot depth at the locations, for us, as open, park-like area. Total area at each location will be somewhere between 13,000 sqft to 15,000 sqft depending on the typical lot depths.

Response 14-3:

The commentor's requested changes have been incorporated into the project design. As stated above, the applicant submitted modifications for the proposed project, which eliminated two residential lots (future homes) on the project's 80th Street/Rayford Drive frontage. (The total proposed number of homes on these streets in this most recent plan has been reduced from 31 to 29 homes.) Due to the elimination of two residential lots, the two open space lots at Hastings Avenue and Park Hill Drive (Lots 127 and 128) were able to be widened to a minimum of 100 feet. These lots are approximately 13,55 sq.ft. and 12,630 sq.ft., respectively.

Comment 14-4:

- Colegio extension-15' wide extension of the Street to form a cul-de-sac at the north-end of Colegio in addition to the current city setbacks. This will be landscaped with input from the Colegio residents.

Response 14-4:

The revised Tentative Tract Map for the project that has been submitted to the City includes a proposed open space Lot 129 located adjacent to the existing 81st Street and Colegio Drive right-of-ways. The purpose of this lot is to provide an additional landscaped buffer between the existing homes on these streets and the proposed residential lots (Lots 101, 103 and 104) in the project. This proposed open space lot would be over 15 feet at its widest point. This lot coupled with the existing 15 foot parkway on the north side of 81st Street will provide a combined landscaped strip of approximately 30 feet between the curb and the future wall of the proposed project residential lots. New curb and gutter is proposed to be constructed at the north end of Colegio Drive to provide a transition between the existing easterly curb of Colegio and the northerly curb of 81st Street in the form of a modified elbow design.

Comment 14-5:

PARK-LIKE, OPEN SPACE-BLUFF ACCESS AND COMMUNITY VIEWS

- "D" Street bluff-side (approximate location)-A minimum 40' wide by the typical lot depth, open, park-like area to preserve the ocean and city views.

A Pedestrian Path would be established along the building set back-zones behind Lots 1 through 27 and Lots 45 through 50. Walking to the east, the Pedestrian Path would follow the bluff-edge to connect to the Lincoln View Park. Walking to the west, the Pedestrian Path would follow the bluff-edge to connect down the bluff-face to Cabora Road (as originally proposed by the developer) and would continue around the bluff-edge to connect to the existing Veragua Walk easement at Berger Avenue. This includes the provision for full public access stated in the CC&R's.

Response 14-5:

The project applicant submitted minor project modifications as part of the Tentative Tract Map to the City following distribution of the Subsequent Draft EIR, in response to community concerns. The modifications included increasing the amount of dedicated open space from 16.75 acres to 17.33 acres as well as reducing the total number of residential lots from 120 to 119.

Changes also include modifications with regard to pedestrian trails. Open space Lot 122, which provides a pedestrian linkage to the bluff top, would be increased to 40 feet in width, and extended in a 10-foot strip behind Lots 1 through 14 for purpose of providing a bluff top walkway between Lot 122, "A" Street and the view park (Lot 125). The proposed trail down the bluff face to Cabora Road, following the alignment of the former radar/radio antenna site service road, has been eliminated from consideration, as this concept would result in extensive modifications to the bluff face. Access to the wetland is now proposed to be via the bluff path to the view park and then along "A" Street to Lincoln Boulevard onto Cabora Drive. The trail off Lincoln Boulevard would deposit pedestrians in the approximately same area as the previously proposed bluff face trail, while still providing access to the wetlands, but would require less grading and engineering of the bluff face and minimize potential visual and biological impacts to the bluffs. In addition, the proposed bluff top trail would also have the advantage of being accessible to handicapped users. The trail would also extend around the northern and western end of the project behind Lots 15-27 and 46-50, providing access in these areas beyond what was proposed in the Subsequent Draft EIR and beyond what is proposed by the commentor. These modifications are included in the Revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR.

The proposed bluff trail includes extension of the trail to the west behind Lots 15 through 27 and Lots 45 through 50. This trail would continue behind lots 15 through 27 and follow the bluff top setback. Behind Lots 45 through 50, the trail would need to be cut into the proposed

Hastings Canyon fill slope. The trail on the fill slope would need to be located between 6 and 12 feet below the top of the slope and may require retaining walls between 5 and 8 feet in height. The trail would connect at its southwest end with a new proposed open space lot (Lot 120) that would connect with "E" Street. Proposed open space Lot 130 would then provide access between Berger Avenue, "E" Street and the project trail system. This right-of-way connects with Berger Avenue and the adjacent lots that have existing homes. The commentor's suggestions of connecting the pedestrian path with Veragua Walk is not feasible due to the steepness of the topography. Connecting the pedestrian path with Veragua Walk would require the construction of stairs in order for the trail to meet the existing grade of the project site. However, the commentor's suggestion regarding the bluff trail variation will be forwarded to the decision makers reviewing the project proposal for final determination of the bluff trail alignment, should the project be approved.

Comment 14-6:

OUR RATIONALE: The Northwest Portion of the West Bluffs Development overlooks the Ballona wetlands, Marina del Rey, the Santa Monica Bay and the Pacific Ocean. Each of these areas is a "jewel" of our Southern California landscape, and should be shared by all. The Ballona Wetlands in particular are in the process of being restored as one of the few remaining true wetland areas in Southern California. However, by allowing development of West Bluffs without a Pedestrian Trail or other means to overlook, access and view these treasures, we would be depriving the surrounding community of their ability to appreciate and enjoy them.

Response 14-6:

As discussed in Response 14-5, the applicant has proposed modifications to the bluff trail which would provide a pedestrian trail behind Lots 1 through 14 and has also proposed a variation on the bluff trail that would extend the trail behind Lots 15 through 27 and Lots 45 through 50. This trail alignment would provide views to the west in addition to those provided by the previously proposed bluff trail alignment.

Comment 14-7:

The proposed Pedestrian Trail on the north-northeast portion of the West Bluffs property is not adequate and does not provide views of, nor access to the wetlands and no view of the Santa Monica Bay or of the Pacific Ocean. Rather, it overlooks Lincoln Boulevard and what will be the eastern side of the Playa Vista Project. Although this view park and northeast-side trail is

appreciated and should be retained, it does not provide the sort of environmentally and aesthetically beneficial views that would be achieved through a Pedestrian Trail around the entire bluff and access site at the Northwest Corner of the project.

Response 14-7:

Please see Responses 14-5 and 14-6 for discussion of the location of the bluff trail.

Comment 14-8:

We believe a Pedestrian Trail along this bluff could easily be constructed, in an environmentally and aesthetically sensitive manner, by being designed in conjunction with Hastings Canyon being filled-in and the bluff face itself being reconstructed.

We are concerned that if the development proceeds without the Pedestrian Trail, residents of the existing community who are accustomed to using the existing well worn path will attempt to access the bluffs by "carving" their own path around the bluffs. This will lead to conflicts and dissension between our new neighbors and the existing community, thus increasing the risk to everyone involved. A well-planned Pedestrian Trail is a proactive means to alleviate the issue.

Response 14-8:

Please see Responses 14-5 and 14-6 for discussion of the pedestrian trail.

Comment 14-9:

Further, we assert that constructing a Pedestrian Trail along the bluff is consistent with and responsive to the relevant regulations associated with the Coastal Bluffs Specific Plan, City Plan Case No. 90-0598(SP), (formerly the Westchester/Playa del Rey Specific Plan) (subsequently approved and adopted by the City of Los Angeles on January 7, 1993) and The Coastal Act. This legislation is intended to protect and preserve coastal accesses, while preserving prominent view corridors and viewpoint as a highly valued public resource.

Response 14-9:

The Subsequent Draft EIR determined that the proposed project would be consistent with the requirements of the Coastal Bluffs Specific Plan (page 204) and the Coastal Act (pages

197-201). However, proposed changes to the bluff trail to allow for greater access, developed following distribution of the Subsequent Draft EIR, are discussed in Responses 14-5 and 14-6.

Comment 14-10:

NOTE: The above items regarding Park-like, Open Space should include the provisions for full public access and zoned so the areas can not be converted into resident vehicle access points to be stated in the CC&R's.

Response 14-10:

The proposed open space lots on the north side of the project, along bluff top (Lots 122 and 125), are all intended to provide improved, dedicated public access to the bluff top areas where views can be enjoyed by all. Similarly, lots along Berger Avenue, 80th Street, Rayford Drive, and 81st Street (Lots 120, 127, 128, 129, and 130) will provide additional dedicated public open space along the south side of the project site.

Comment 14-11:

TRAFFIC MITIGATION

- If cost of these improvements exceeds the $350,000 budgeted (present value), the City and the DOT will work with the developer, Hughes Corporation, Southern California Gas Company, Playa Vista Development, LAX, along with any other public/private organization to obtain the necessary funding to complete the Traffic Phase Two of the project as planned.

Response 14-11:

The applicant's commitment to the Neighborhood Traffic Intrusion Program (NTIP) is identified in Response 8-4. Comments regarding the possible participation of other entities will be forwarded to the decision makers for their consideration.

Comment 14-12:

- The City and the developer will finalize the details of Traffic Phase One Mitigation with the WBSC including the stop sign for Colegio at 81st Street and explore alternatives for additional safety measures for the 80th Street crest in lieu of speed bumps.

Response 14-12:

The NTIP program has been presented to the WBSC and is currently being finalized with LADOT. The WBSC and other residents of the affected neighborhoods have been involved with the development of the program through a series of meetings/workshops, and have been briefed on the elements of the conceptual plan currently submitted to the City. Alternate measures for 80th Street are being explored, but have not yet been determined. Such measures, if necessary, will be part of Phase II of the program. Likewise, stop signs at Colegio Drive and 81st Street are not part of the current proposal, but may be included in Phase II (see also Response 8-4).

Comment 14-13:

- The intersection of 83rd Street and Lincoln Blvd. are of particular concern and will be addressed in the Traffic Phase Two studies, as well as, other necessary traffic improvements throughout the community.

Response 14-13:

This location will be monitored to determine the NTIP program's effectiveness, and if necessary, improvements could be made at this intersection. However, the specific emphasis of the NTIP as a whole is to discourage cut-through traffic in the neighborhood. This is accomplished by implementation of turn restrictions, speed humps, traffic circles, additional stop signs, and other measures which make any cut-through route less attractive from a convenience or time-saving perspective. Any improvements to the Lincoln Boulevard/83rd Street intersection, particularly to 83rd Street, could increase the capacity of this location, and be at odds with the intent of the NTIP and the overall desires of the residents of the affected neighborhoods. Therefore, at this time, no improvements at this location are proposed.

Comment 14-14:

GRADING OF THE PROJECT

- There will be a meeting scheduled between the developer, the City and the WBSC to review details of the grading. We consider this to be an open issue until we receive further details expected to be discussed as part of a site visit and meeting being planned between the City, the developer and the WBSC. The WBSC will issue an amendment document after the meeting.

Response 14-14:

The comment requesting a meeting with the applicant is acknowledged. The applicant met with the WBSC on Friday, July 31, 1998.

Comment 14-15:

BUILDING SET BACK REQUIREMENTS

- The City and developer have clarified the set back requirements to our satisfaction.

Response 14-15:

This comment will be forwarded to the decision makers for their consideration in reviewing the project proposal.

Comment 14-16:

BUILDING HEIGHT REQUIREMENTS

- There will be a meeting scheduled between developer, the City and the WBSC to review details of the building heights. We consider this to be an open issue until we receive further details expected to be discussed as part of a site visit and meeting being planned between the City, the developer and the WBSC. The WBSC will issue an amendment document after the meeting.

Response 14-16:

The comment requesting a meeting with the developer is acknowledged. The applicant met with the WBSC on Friday, July 31, 1988. A building height limit of 35 feet will be imposed by deed restriction, which is ten feet below the City requirement. A mitigation measure to this effect is added, see Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 14-17:

CONSTRUCTION MITIGATION

- Construction mitigation will be in accordance with the plan outlined during the June 9, 1998, community meeting hosted by the developer at the Furama Hotel.

Response 14-17:

A project mitigation measure has been added, requiring adherence to the Applicant's Required Construction Practices, consistent with discussions between the applicant and the community. See Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 14-18:

- A vermin abatement program will be provided by the developer and reviewed with the community.

Attachment: West Bluffs Steering Committee
List of Committee Members

Response 14-18:

As stated in Response 14-17, the project would be required to adhere to the Applicant's Required Construction Practices. As part of this, a vermin abatement program will be submitted to the community for input prior to construction activities. See Section II, Corrections and Additions to the Subsequent Draft EIR.

LETTER NO. 15
Signed by: Chester King, Ph.D.

July 6, 1998

Topanga Anthropological Consultants
P.O. Box 826
Topanga, California 90290

Comments concerning cultural resource element of
Environmental Impact Report No.: 91-067-SUB(CDP)(PP)(ZBA)
for the West Bluffs project

Comment 15-1:

I am concerned about the planned destruction of archaeological sites in the West Bluffs development area. I am a professional archaeologist, and specialize in the study of the prehistory of California. I have served as President and Vice-president of the Society of California Archaeology. I have written chapters of the Handbook of North American Indians volume on California produced by the Smithsonian Institution. My dissertation was selected for publication in a series of 31 outstanding dissertations concerning the archaeology of North American Indians. My writings are frequently referenced and I am recognized as a leading specialist in the field of California Archaeology and Ethnohistory.

Response 15-1:

The commentor's concerns over the cumulative effect of development on archaeological resources in southern California are acknowledged.

Comment 15-2:

The archaeological element of the EIR fails to identify impacts of the project or the significance of the impacts.

Response 15-2:

Project impacts to archaeological resources were evaluated in Section IV.T, Cultural Resources, of the Subsequent Draft EIR. Grading of the bluff top may remove the three archaeological deposits, only two of which (LAN-63 and-64) are regarded as significant.

Previous extensive data recovery programs at these sites have mitigated the loss of information associated with such sites.

Comment 15-3:

It proposes that the Native American monitors that are paid to watch the destruction of the settlements and cemeteries of their ancestors as a mitigation for the destruction of their culture should also have to remove the burials of their ancestors from the place of their original burial.

Response 15-3:

The results of the previous large-scale field studies indicate that neither cemeteries nor village settlements are situated within the proposed project boundaries. The proposed treatment of human remains that is identified in the Subsequent Draft EIR is in accordance with state law (see Subsequent Draft EIR page 376). No other treatment is legally permissible.

Comment 15-4:

The EIR was prepared by archaeologists that have little knowledge of California prehistory and archaeological sites and no respect for the dignity of California Indians.

Response 15-4:

The commentor's opinion about the archaeologists who were involved in the preparation of the Subsequent Draft EIR is acknowledged. However, Drs. Altschul and Van Horn are both certified by the Society of Professional Archaeologists and they have more experience with the archaeology of the Ballona Lagoon region than any other archaeologists in the world. Dr. Van Horn has been a California archaeologist for thirty years. He has been directing major archaeological projects in the Ballona area since 1984. For example, between 1984 and 1987, Dr. Van Horn led the largest testing and data recovery effort ever mounted in the region. He directed excavations at LAN-59, -61, -63, -64, and -206 on the bluff tops and supervised test excavations at LAN-62 and -211 along Centinela Creek. Dr. Van Horn and his colleagues produced a series of monographs on their work. Additionally, Dr. Van Horn and his associates have published numerous peer reviewed articles on their work in professional journals including the *Journal of New World Archaeology* and the *Pacific Coast Archaeological Society Quarterly*. Further, Dr. Van Horn was for some time the editor of the *Pacific Coast Archaeological Society Quarterly*.

Dr. Jeffrey Altschul has been working in the Ballona region since 1989. He has served as Principal Investigator on the data recovery efforts at the prehistoric Admiralty site (LAN-47) along the edge of the historic lagoon and the prehistoric Centinela site (LAN-60), situated along Centinela Creek; on test excavations of prehistoric sites LAN-193, SR19, SR20, and LAN-62 as well as historical-period sites LAN-1932H, -1933H, -1934H, and -1596H; on the survey of the 1,087-acre Playa Vista project site; on the reconstruction of the Holocene environment of the Ballona Lagoon; on evaluation of two National Register-eligible districts; and on development of a comprehensive regional research design for prehistoric and historic cultural resources. Dr. Altschul has presented papers on Ballona Lagoon archaeology at both regional (Society for California Archaeology) and national meetings (Society for American Archaeology). He has published two monographs reporting the results of investigations at the Admiralty and Centinela sites. Dr. Altschul and his colleagues also published a chapter entitled Late Prehistoric Cultural Change in the Ballona Wetlands in the volume *An Examination of Some Significant Sites in the Central Coast of California* (edited by Herb Dallas, Jr., Coyote Press, 1993).

Dr. Altschul is well known nationally. He has served on the Board of Directors for the Society of Professional Archaeologists and is currently Treasurer of the Society for American Archaeology. Dr. Altschul is also well known among Native Americans, particularly those claiming affiliation with the Ballona Lagoon region. He is currently working with four Gabrielino groups on the Playa Vista project (Gabrielino/Tongva Tribal Council; Coastal Gabrielino/Tongva Tribal Council; Coastal Gabrielino; and Gabrielino People/Spring Foundation). He also worked with the Shoshone Gabrielino Nation during the data recovery at the Admiralty site and the development of the Programmatic Agreement for the Playa Vista project.

Comment 15-5:

The EIR documents consist of a positive review by Jeffrey Altschul of Statistical Research Inc., Tuscon [*sic*], Arizona of material prepared for a previous EIR by David Van Horn (Appendix J). It describes Van Horn's previous work as a mitigation program. Van Horn's excavation program was not conducted as a mitigation program to satisfy EIR conditions. Van Horn's work is misrepresented, it was a testing program. The technical appendix references three reports by Van Horn and White produced in 1997. These reports were not filed at the South Central Coast Information Center at UCLA and are not available to other archaeologists.

Response 15-5:

Dr. Van Horn and his associates conducted test excavations at LAN-63, -64, and -206A. Because LAN-206A was determined not to be significant, no mitigation was necessary. A research design was developed for LAN-63 and -64 and approved by a peer review panel. The plan was executed and a final report was produced to support the cultural resources portion of the previous EIR.

Dr. Van Horn, Laurie White, and Robert White prepared three additional reports. One described the volunteer salvage effort at LAN-206, located off the project site. Two additional reports were prepared on the protohistoric and early historic occupation of the Ballona. It was concluded that no such occupation occurred on the project site. As stated in Appendix J of the Subsequent Draft EIR, all three reports were available at Archaeological Associates, Ltd. Further, copies of these reports are also available through Statistical Research, Inc., and Planning Consultants Research.

Comment 15-6:

Significance of Project Sites

To interpret the significance of California archaeological sites, it is necessary to know what the archaeological sites of historic and protohistoric settlements described in historic documents look like as archaeological sites. This baseline information can be used to interpret the significance of sites of earlier periods that have similar organization and contain similar artifact remains. Interpreting the significance of earlier sites also requires understanding changes caused by rodent burrowing and other soil development processes that result in decreased frequencies of faunal remains at earlier sites. Within a local area or region where most sites are preserved, it is usually possible to observe changes in types of situation chosen for settlements over time. Many changes in settlement location are similar throughout California. There is a general trend for settlements to move from higher to lower elevations over time. On the basis of comparison with sites in other areas of southern California, the project sites are the remains of substantial settlements. These settlements were permanent and were probably occupied throughout the year.

Response 15-6:

The results of the previous intensive excavation program indicate that the deposits on the project site: (1) lack well-developed midden; (2) exhibit relatively low densities of cultural material; (3) lack structural remains; and (4) lack burials. Therefore, in the opinion of the

project's archaeologists, the evidence indicates that the archaeological sites are not the remains of settlements that were permanent and occupied throughout the year.

Comment 15-7:

Appendix J contains contradictory statements concerning interpretation of the significance of the sites. On pages 4-8 of Appendix J, the discussion indicates that the sites were used as permanent settlements before 1000 BC and were used later as temporary camps. In discussion on page 16 it is implied that the sites were always seasonally used camps. It states:

> Small groups of people returned to the bluffs on a periodic basis through out the year. This pattern of land use continued for thousands of years. Distinguishing the deposits into different sites may be a useful bookkeeping device, but the two sites should not be viewed as separate occupations. They were both formed by the same or similar groups performing similar behaviors, and are in essence, one site with multiple loci.

Response 15-7:

The commentor asserts that the use of sites both as temporary camps and habitations is contradictory. The project archaeologists, however, see no contradiction. LAN-63 and -64 were used for thousands of years, and it is entirely reasonable for the sites to have been used as a campsite by people at one or more points in time and habitations by other people at other times. Given the low-density deposits which are not well developed, for most of prehistory the property was likely used intermittently by relatively few people.

The significance of a Native American site does not turn upon whether the site was used on a temporary, seasonal, or permanent basis. Rather, significance is determined from a site's ability to provide data of importance to understanding prehistory or history. Specifically, sites LAN-63 and -64 were recommended as significant because they provided important information on environment, settlement, subsistence, technology, and cultural affiliation of groups inhabiting the Ballona Lagoon between 2,000 and 2,500 years ago.

Comment 15-8:

Most of the hearth areas discovered during excavations at the project site were probably inside houses. In archaeological sites, shellfish concentrations are found in the immediate vicinity of houses where meals were eaten. Site areas with highest concentrations of shell are apt to

contain the highest density of houses. Houses can be identified through the use of large scale archaeological excavations.

Area exposures and study of trench profiles are techniques which have been Successfully used to document houses and other structures in prehistoric California sites. In cases where these techniques don't succeed because soil development has obscured traces of pits and floors, it is possible to carefully collect artifacts from small grid squares (including artifacts smaller than recovered by previous excavations) and plot their distributions to identify areas within houses and other activity areas.

In addition to houses where people ate, ancient California Indian settlements contained structures and areas whose locations can not be identified on the basis of observations of shells. Areas of sites which are often outside shelf middens include cemeteries, sweat loges [*sic*] or men's houses, dancing areas, ceremonial enclosures and game courts. Areas without shelf may contain archaeological remains which can be identified only through careful excavations. Study of sexual division of labor and use of space by men and women is an important topic of research related to Early period settlement. It appears that men and women conducted more activities separately during the Early period, men may have lived in community houses such as sweat lodges. They apparently ate at the houses. In later periods, it appears that men and women more often worked and ate together.

Response 15-8:

The commentor's inferences about houses and activity areas are noted. The sample extracted from the West Bluff archaeological sites is extremely large, and careful study of the configuration of surface finds and soil stratigraphy failed to indicate the presence of houses. This could be because no houses were present. It could also be that the soil, which comprises almost pure sand, failed to preserve the usual archaeological indications of houses such as trampled earth floors or storage pit outlines. In any event, a substantial body of evidence indicates that features such as cemeteries, sweat lodges, men's houses, dancing areas and ceremonial game courts are entirely absent at the project site.

Comment 15-9:

In my response to the notice of preparation of the draft EIR in November, I stated:

> Two large archaeological sites will be destroyed by the proposed project. The natural contours of a large vernal pool will also be destroyed. The archaeological sites are the remains of settlements occupied by native

> Californians. They are the last intact sites on the Bluffs overlooking Ballona Creek and may be the largest relatively undisturbed village sites left in the Los Angeles Basin. The sites are important to archaeologists because they contain the unique record of history and the information contained in them can be used to answer questions concerning history. They are important to the members of native groups as places of historical significance because ancestors lived and were buried there and their history is contained within them. Unique features of the landscape are also important because plants which are important to native societies grow there. Developments can cause divisions within the native community because developers often rely on one person who does not represent the main native organizations. The degree to which the value of the sites is respected or disrespected during the hearing process can affect the self esteem of the people who identify with their native heritage.

Response 15-9:

The commentor raised three points in his November 1997 letter. His first concern regarded the importance of LAN-63 and -64 as archaeological resources. The Subsequent Draft EIR analysis concurs that these sites are scientifically significant, and finds that previous data recovery has mitigated the impacts of development. Additionally, a series of procedures (outlined in mitigation measures beginning on page 375 of the Subsequent Draft EIR), including remote sensing, feature excavation, and curation, will be performed prior to and during construction that will supplement the information already retrieved. The commentor's second point relates to the impact on and the division within the Native American community that may be caused by developments such as the proposed project, with different segments being in favor or against a particular development. That the Native American community in Los Angeles is quite varied and diverse is acknowledged. However, the development review process allows and encourages participation from those in favor or against a particular development. In addition, the intent of the EIR process is to evaluate and mitigate where feasible, the physical impacts of a project on the environment. For further discussion of this issue, see Response 15-13.

Finally, as to the commentor's third point about the alleged destruction of a vernal pool, the presence of a topographic depression on the bluff top within the project site, north of the intersection of Hastings Avenue and 80th Street, was noted by Planning Consultants Research (PCR) biologists and a US Army Corps of Engineers (Corps) field investigator during field surveys (see Section II, Corrections and Additions to the Subsequent Draft EIR). Section IV.X.C.1, Surface Water Runoff/Hydrology, characterizes this depression as a sump and indicates that surface water overflow from this area is the cause of seasonal nuisance flooding

along Hastings Avenue. However, vernal pools exist due to the presence of several physical and biological indicators, including characteristic topography; suitable soils (hardpan or other near-surface impermeable substrate) to inhibit downward percolation and allow accumulation of standing water for a specific duration; and, most critically, vernal pool indicator plant species (plants which thrive in an aquatic and semi-aquatic environment). The Corps also requires the presence of vernal pool vegetation in order for an area of ponded water to constitute a vernal pool, and additionally views the presence of fairy shrimp as an indicator of vernal pool presence, as the shrimp represents incontrovertible evidence of a lengthy period of inundation to a certain minimum depth. The presence of a mere topographic low point, even one which collects seasonal standing water and supports wetland vegetation, does not constitute a vernal pool and may not constitute a jurisdictional wetland regulated by the Corps.

Vernal pools are shallow depressions supporting temporary ponds which form above hardpan, claypan or volcanic soils during the rainy season, but which dry up completely by late spring or early summer. Vernal pools are usually defined by an extended duration of inundation, which distinguishes vernal pools from mere "ponding," and, most importantly, by their specialized endemic floras, which are distinct from typical riparian and wetland flora, as well as fauna (fairy shrimp).

Vernal pools are considered isolated wetlands by the Corps and are regulated as "waters of the United States" pursuant to Section 404 of the Clean Water Act of 1972. Vernal pools which also contain a federally listed endangered or threatened species additionally fall under the jurisdiction of the US Fish and Wildlife Service (Service) as critical habitat for that species, in accordance with the Endangered Species Act of 1973, as amended. Accordingly, in the course of biological resource field surveys conducted on the project site by PCR biologists in 1997, the Corps was consulted and participated in field surveys, together with PCR biologists, specifically in order to ascertain the presence or absence of Corps jurisdictional area on-site, including vernal pools. While the presence of a topographic depression north of the intersection of Hastings Avenue and 80th Street was noted, neither a characteristic impervious subsurface soil horizon nor any indicator plant species were observed within or in proximity to this area by Corps or PCR personnel. As stated in Section IV.A.1, Grading, in the Subsequent Draft EIR, the substrate beneath the depression comprises Quaternary Terrace deposits, which consist of fine-to medium-grained sands; such soils are poorly to moderately cemented and drain relatively quickly, and no underlying hardpan substrate was observed. As no evidence of federally listed plant or animal species was observed, no Service jurisdiction was indicated.

Additional botanical surveys were performed in January 1998 and no vernal pool species were observed; periodic checks during subsequent months by PCR wetland ecologists for evidence of ponded water on the project site revealed none. The absence of water, vernal pool plant

species or fairy shrimp in the midst of the exceptionally wet "El Nino" rainy season of 1997-1998 supported the determination that no vernal pool exists on the project site. Moreover, none is likely to form in the future as ideal conditions existed during survey periods. Thus, while anecdotal evidence provided by this and other commentors suggests that the depression supports a seasonal accumulation of water and attracts wildlife to the area, such an accumulation only constitutes ponded water and does not represent a regulated wetland or vernal pool in the legal sense embodied within Section 404 of the Clean Water Act or the Federal Endangered Species Act, which determination is based on the presence or absence of necessary physical *and* biological indicators. The on-site topographic depression is not, therefore, a protected resource.

PCR is aware of the historic presence of vernal pools in the project area within the larger "coastal prairie" ecosystem, and it is conceivable that historic discing of the project site for fire control for an unknown period of time has long since altered the project site's original micro topography and eliminated the native vegetation. However, as the characteristic vernal pool indicators were not observed, the Corps has determined that vernal pools are absent from the project site, and, furthermore, since CEQA Guidelines require only a description of the project environment as it exists before the commencement of the project (i.e., contemporaneous physical conditions), it would be impractical, and, moreover, is not within the scope of this Subsequent Draft EIR, to exhaustively research the possibility of past existence of vernal pools on the project site.

Comment 15-10:

The EIR does not respond to the issues concerning significance raised in this statement. Presence of human bone from Van Horn's excavations at the project sites is documented in the UCLA NAGPRA inventory list. The presence of bone from the sites, as well as the frequent presence of cemeteries at similar settlement sites, indicates that it is probable cemeteries will be encountered during grading, if grading is carefully observed.

Response 15-10:

The Subsequent Draft EIR acknowledged the potential for encountering human remains during construction. However, it is unlikely that a cemetery will be encountered on the project site. Formal cemeteries have not been found at any sites in the Ballona region. For example, cemeteries were not encountered at the Admiralty site or at the Peck site, where, according to the archaeologists supervising the excavations (Keith Dixon and Stuart Peck, respectively), burials were randomly placed in the midden. Cemeteries were also not found at any of the bluff sites (LAN-59, -61, -63, -64, or -206), although isolated human remains were

encountered at some. Cognizant of the potential for finding human remains in the sites, the project archaeologists have devised a proactive approach which was presented in the Subsequent Draft EIR. Remote sensing techniques, which are nonevasive and nondestructive, will be used to survey the project site prior to construction. Anomalies, which could be archaeological features or burials, will be identified. Hand excavation will be used to remove the remains. Although many features and burials may be found through these methods, it is likely that some will go undetected. Consequently, in addition to these measures, all ground-disturbing construction activities will be carefully monitored to ensure that human remains are detected and excavated appropriately.

Comment 15-11:

Impacts

The EIR does not describe the actual project impacts. It appears that the sites will be completely chopped up by grading machines and then compacted as fill in new locations including the bottom of the vernal pool and canyon areas. The impact of this activity will be to completely eliminate opportunity for future archaeological study of organization of the sites. We will not know much about the organization of the sites; we will not know the organization of artifacts and features in different houses and we will not know the organization of small artifacts in the sites. Burials in cemeteries at the sites will apparently be graded away or if observed during grading will be removed by the Native American monitor without archaeological recording.

Response 15-11:

The commentor asserts that construction will preclude the ability to study the organization of LAN-63 and -64. The project archaeologists believe, however, that previous work, in conjunction with the mitigative conditions proposed, will provide future researchers data needed to explore these issues. In fact so much data was gathered from previous explorations of the project site that thoroughly analyzing it will require many years of study. Burials will be excavated by archaeologists in accordance with state law; Native Americans will monitor these operations.

For a discussion of vernal pool presence/absence on the project site, please refer to Response 15-9. As stated in Section IV.A.1, Grading, of the Subsequent Draft EIR, the bluff top, including the topographic depression incorrectly cited as a vernal pool by the commentor, would be graded and filled following project implementation. As no vernal pools were

observed to exist on the project site, however, grading of the bluff top is not anticipated to result in a significant impact on biological resources, including vernal pools. For a discussion of the absence/presence of cemeteries on the project site, please see Response 15-10.

Comment 15-12:

The EIR concludes that the cumulative impact of all area development (obliteration of all archaeological sites in the area) upon area archaeological resources may be significant. The conclusion is reached without discussion and the word may apparently means "will". It appears that the project will cause unmitigatable impacts.

Response 15-12:

The Subsequent Draft EIR does find that cumulative impacts may be significant (Subsequent Draft EIR page 375). Many of the sites recorded by professional and amateur archaeologists in the area prior to 1950 no longer exist. These include all or portions of sites later determined significant during CEQA undertakings, such as the Admiralty site (LAN-47), the Hughes site (LAN-59), the Centinela site (LAN-60), the Loyola Marymount site (LAN-61), and the Berger site (LAN-206). It should be noted, however, that not all sites in the Ballona region have been or will be destroyed. Preservation of sites is already taking place. Undisturbed portions of the Admiralty site, for example, are preserved under the linear parkway north of Admiralty Way. Additionally, sections of the archaeological sites along Centinela Creek are slated for preservation in the riparian corridor and open space being proposed as part of the Playa Vista project. Contrary to the significance determination for cumulative impacts, the project itself will not cause significant impacts.

Comment 15-13:

Mitigation

Data recovery has not proven a reliable mitigation measure. The archaeological firms chosen to conduct studies have inadequately trained personnel. We might imagine that the developer would hire the best imaginable team of archaeologists and give them a large budget (so large the developer would not be able to recover the amount from sales of the project). Even under such unprecedented conditions, limits of time, limits of numbers of trained personnel, limits of knowledge of categories of archaeological data (compared with the future) and destruction

which results from use of archaeological collection procedures will result in less than perfect collection of information contained in archaeological sites.

If the project results in disturbance of native sites, it will have an impact on the American Indian community. It is difficult for parents to explain why their heritage is not accorded the same respect as the heritage of other societies. Archaeology studies have also resulted in splitting native communities into people who work for developers and those who don't. Support by developers and public agencies of Indians who condone destruction of ancestral sites creates a situation in which not just sites at one project are allowed to be destroyed but also sites at other projects. Native people who observe the manipulations of developers and public agencies conclude that the larger "white" society is still taking from Indians. The project will almost certainly and may already have increased divisions in the Native community. The archaeology program and the ultimate destruction of sites will demonstrate that Native history is not considered as important as the history of European colonists. I know of no case in southern California where sites were destroyed and impacts to Native communities were mitigated.

Until the activities conducted at the project sites have been discovered and conclusively demonstrated and the numbers of people involved in the activities has been determined, the sites are unique and valuable to our understanding of the prehistory of the Los Angeles area. The applicant's archaeologists have accomplished neither goal. The applicant's archaeologist fails to mention that archaeologists conducting research in the area interpret the significance of the sites differently than he does. He fails to relate his research to long term research goals. His discussion implies that he has already learned everything there is to know concerning the sites. The applicants archaeologist relies on Van Horn's hand picked peer review committee's (many of the members of the committee are dead) agreement with Van Horn's conclusion that he found everything significant that the sites contain. There is no discussion concerning the importance of the information remaining in the sites to archaeologists currently conducting research in southern California.

Response 15-13:

The comment makes several claims: (1) that data recovery is not a reliable mitigation measure and insufficient funds were expended for mitigation; (2) that the archaeological firms conducting mitigation programs on the project site used inadequately trained personnel; (3) that the archaeological programs have not mitigated social impacts to Native American communities; (4) that the project archaeologist's concept of significance is too limited and fails

to relate the proposed research program to long term research goals; (5) that the project archaeologists have relied too heavily on a peer review committee and excluded the interests of outside archaeologists; and (6) that the applicant's archaeologist has falsely claimed that he knew everything there was to know about the West Bluff project archaeological sites.

Regarding the first item, data recovery is a lawful means of mitigating impacts to archaeological sites. Furthermore, California law explicitly limits the amount of money which an applicant may be required to pay for mitigation of impacts to archaeological sites (see Public Resources Code §21083.2(e) and CEQA Guidelines, Appendix K).

Secondly, the West Bluff excavation staff is fully qualified. Both Van Horn and White hold graduate degrees and both are members of the Society of Professional Archaeologists. The advisory board which oversaw field operations included a former Chairman of the Department of Anthropology at the University of California, Los Angeles, a former Chairman of the Department of Anthropology at California State University, Long Beach, and the former Curator of Anthropology at the Los Angeles Museum of Natural History. Many of the crew members who worked on the West Bluffs' sites held Bachelor degrees at the time and at least one had published papers on Los Angeles prehistory.

Thirdly, the commentor's concerns about the impact that project disturbance of native sites may have on the Native American community and that the project may already have increased divisions on the Native American community are acknowledged. However, as discussed in Section IV.T, Cultural Resources, of the Subsequent Draft EIR, previous extensive data recovery programs at the two significant archeological sites located on the project site have already mitigated the loss of information associated with such sites such that no further excavation could normally be required as mitigation (see Public Resources Code §21083.2(d)). Nevertheless, with the concurrence of the applicant the Subsequent Draft EIR contains mitigation measures to address accidental or unexpected discoveries of human remains and other unique archeological resources during project grading and construction which, together with the previous excavation/mitigation program on the project site, would reduce the project's significant effects on archeological resources to below the significance level. CEQA requires no more. See State CEQA Guidelines Section 15131.

Fourth, the project archaeologist used the definition of significance set forth in Section 21083.2 of CEQA and Appendix K of the State CEQA Guidelines. CEQA equates significant effect with scientific importance. Research questions pertaining to prehistoric subsistence, chronology, technology, and cultural affiliation outlined in the most current regional research

design for the Ballona Lagoon region-that developed in 1990 to guide the long term Playa Vista project-were used to evaluate the three archaeological sites on the West Bluffs project site. The project archaeologist found that both LAN-63 and -64 contained information pertinent to these regional research questions, and therefore, met the criteria of significance (i.e., scientific importance or unique resource) as stipulated in CEQA. In contrast, LAN-206A did not have the potential to meet the criteria, and thus, was not considered significant.

In response to the commentor's fifth point, most archaeologists and related specialists with a demonstrated interest in the Ballona Bluffs participated in the excavation and analysis programs conducted at the project site. A few examples include Vincent Lambert, who has studied surface collections from the bluffs for many years; Dr. Roy Salls, who was the leading researcher in archaeological fish remains along the southern California coast; and Professor William Wallace, who is currently compiling unpublished research from local coastal deposits. Further, participation of specialists and interested scholars was an especially strong feature of the West Bluff archaeological programs.

Finally, in response to the Commentor's sixth point, no one has claimed that they have learned everything there is to know about the West Bluff archaeological sites. However, it is claimed that a great deal has been learned and that the body of information collected meets both the spirit and the letter of CEQA requirements.

Comment 15-14:

The proposed study relies on remote sensing to identify features and different areas within the archaeological sites. A small amount of archaeological excavation would then be used to document different site areas. There is no commitment to careful recording of the internal organization of houses or cemeteries. Use of remote sensing techniques is at present experimental. It is worthwhile to pursue use of the techniques to improve our ability to understand archaeological sites. The techniques should be used in conjunction with extensive excavations to document correlations and absence of correlations between feature types and data obtained from remote sensing techniques. If correlations can be determined, the techniques may prove useful for evaluating sites. Ground penetrating radar and other techniques have proven effective in identifying previous archaeological excavations and other recent earth disturbing activities. The proposed procedures have not proved effective in documenting the distributions or sizes of archaeological features such as houses, sweat lodges, cemeteries or other site areas in many sites. The proposed mitigation program is apt to have inconclusive results. Site organization can not be adequately recorded while observing grading

operations. A clear picture of site organization can be achieved through analysis of samples of small artifacts collected under controled [sic] conditions. Experimental techniques should not be relied upon when the last opportunity to record the organization of the sites is at stake.

Response 15-14:

Geophysical remote sensing techniques have been used in archaeology for more than 20 years. Although remote sensing can no longer be considered experimental, it is, like many scientific techniques, constantly being improved. In southern California, two geophysical techniques have proven particularly useful in mapping features in coastal middens. Soil-resistivity, a technique that introduces an electrical current at the surface and measures the ease with which this current flows through the soil, is well adapted to finding walls and other architectural features. Magnetic-field gradient surveys map deviations from the earth's magnetic field, which on an archaeological site may reflect remnant magnetism left in rocks exposed to high heat. Prehistoric hearths and roasting pits are often composed of a concentration of magnetized rocks, which provide detectable signals.

Dr. Altschul, one of the project archaeologists, has been a leader in the use of geophysical remote sensing in southern California. Since 1993, he has incorporated geophysical surveys into archaeological projects in the Prado Basin, San Nicolas Island, and the Ballona Lagoon. In 1997, Dr. Altschul conducted both soil resistivity and magnetic-field gradient surveys at ORA-116 in Newport Bay, and by combining the results of the geophysical surveys was able to detect pit houses, a possible sweat lodge and associated hearths and roasting pits. Subsequent archaeological excavations at ORA-116 were then able to define the internal organization of the site, demonstrating that two sequential occupations took place around 2,000 years ago.

The proposed mitigation plan for the project site incorporates both geophysical remote sensing techniques described above. The geological setting of LAN-63 and -64 is similar to ORA-116, and geophysical surveys should detect archaeological features. If justified by the results of such geophysical surveys, archaeological excavations will then be used to test the geophysical results, with the results used, among other things, to define site organization.

Comment 15-15:

List of Important Publications and Reports by Chester King

1967 *Archaeological Excavations at the Hammack Street Site, Lan-194.* On file with California Department of Parks and Recreation (contains an Appendix by David Weide concerning geology that is important for reconstructing the Ballona Lagoon environment during the historic and protohistoric periods).

1971 "Chumash Intervillage Economic Exchange." *The Indian Historian,* Vo. 4, No. 1. Reprinted in 1976 in Native Californians: A Theoretical Retrospective, edited by Lowell Bean and Thomas Blackburn, Ballena Press.

1970 with Pat Finnerty, D. Decker, N. Leonard III, T. King, and L. King. *Community Structure and Trade at Isthmus Cove: A Salvage Excavation on Catalina Island.* Pacific Coast Archaeological Society Occasional Paper No. 1.

1974 Archaeological Report Related to the Interpretation of Archaeological Resources Present at Vasquez Rocks County Park. On file with the Los Angeles County Parks Department.

1976 with Dennis Casebier. *Background to Historic and Prehistoric Resources of the East Mojave Desert Region.* Prepared for the U.S. Department of the Interior, Bureau of Land Management, California Desert Planning Program. Second printing 1981, Bureau of Land Management, California Cultural Resource Pubications.

1978 Protohistoric and Historic Archaeology. In *Handbook of North American Indians Volume* 8: California, pp. 58-68. Washington, D.C. with Tom Blackburn. "The Tataviam." In Handbook of North American Indians Volume 8: California, pp. 535-537. Washington, D.C.

1984 A review of "The Material Culture of the Chumash Interaction Sphere, Volumes I and II" by Travis Hudson and Thomas Blackburn. *Journal of California and Great Basin Anthropology*, Vol. 6, No. 2.

1986 Beads from Ora-287. In "Archaeological Investigations at CA-Ora-287, A Multicomponent Site on Newport Bay" by Joyce Clevenger et al. Prepared by Westec Services Inc, San Diego for the Flour Corporation, Irvine.

1987 A Review of the Material Culture of the Chumash Interaction Sphere. *American Indian Culture and Research Journal* Vol. 11 No. 4 pp.71-79. American Indian Studies Center, University of California, Los Angeles

1989 "Review of Shell Bead and Ornament Exchange Networks between California and the Western Great Basin" by Bennyhoff and Hughes. *Journal of California and Great Basin Anthropology* Vol . 11, No. 2, pp 268-270.

1990 *Evolution of Chumash Society: A Comparative Study of Artifacts Used for Social System Maintenance in the Santa Barbara Channel Region before A.D 1804.* Revised Ph.D. dissertation, with a new preface and updated bibliography. In The Evolution of North American Indians, a 31-Volume series of outstanding dissertations edited by David Hurst Thomas and published by Garland Publishing, New York. (Beads from the Antelope Valley and other areas of southern California are discussed).

1993 Fuel Use And Resource Management, Implications for the Study of Land Management in Prehistoric California: Recommendations for a Research Program. In *Before the Wilderness: Environmental Management by Native Californians*. pages 279-298. Edited by Thomas Blackburn and Kat Anderson. Ballena Press, Menlo Park.
Native American Placenames in the Vicinity of the Pacific Pipeline. Part 1: The Los Angeles Basin. Submitted to Ann Peak and Associates, Sacramento.

1994 *Prehistoric Native American Cultural Sites in the Santa Monica Mountains*. Submitted to Santa Monica Mountains and Seashore Foundation and Santa Monica Mountains National Recreation Area (contains ethnohistoric information about Guaspet).

Response 15-17:

This listing of the commentor's published work is acknowledged for the record.

LETTER NO. 16
Signed by: Kathy Knight

July 6, 1998

Spirit of the Sage Council
P.O. Box 77127-102
Pasadena, CA 91107

RE: Draft EIR #91-0675-SUB (CDP) (PP) (ZBA)
West Bluff of the Ballona Wetlands

Comment 16-1:

Spirit of the Sage Council has the following comments regarding the above-mentioned Draft EIR. We are faxing this letter and sending follow-up documents in the mail, as Mr. Steve Kane announced at our community meeting on July 1 that he had been told by the Planning Dept. that a postmark of 7-6-98 was sufficient.

1. It appears that you have not responded to our letters submitted for the Notice of Preparation. We asked that a Preferred Alternative be adequately investigated with a Resource Management Plan developed, and the possibility of acquisition by the City of this extremely valuable site. This site is crucial to the Ballona wetlands ecosystem, the Pacific Flyway for migratory birds, for native plants floral and fauna, and for the cultural importance of probably the very last uncovered archaeological sites left in Los Angeles of the Shoshone Gabrielino Nation.

   A Resource Management Plan should definitely be investigated. We see no signs of this having been done. Simply saying a "No Project Alternative" is better is not enough.

Response 16-1:

As stated in the Subsequent Draft EIR, the City and State California Environmental Quality Act (CEQA) Guidelines (Section 15126) require an EIR to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project." The range of alternatives required within an EIR is governed by the

"rule of reason" which requires an EIR to include only those alternatives necessary to permit a reasoned choice. An EIR need not consider an alternative whose implementation is remote and speculative, or whose effects cannot be reasonably ascertained.

The discussion of the No Project Alternative included in the Subsequent Draft EIR (Section VI., Alternatives), represents the project site continuing in its present state and no resulting loss of biological or potential archeological resources. In addition, the Subsequent Draft EIR did include an alternative use analysis for the project site (Alternative 6: Alternative Use-Community Park). Although the analysis specifically focused on the use of the site as a community park, the conclusions are directly applicable to preserving the site and developing a Resource Management Plan. As with the development of a community park, there have been no proposals to purchase the site from the applicant for the purpose of preserving the existing biological and potential archeological resources, and the preparation of a Resource Management Plan. Further, a community park is not consistent with zoning for the site, or with the development plans of the applicant. Therefore, as the environmental impacts associated with preserving the site and development of a Resource Management Plan would be similar to those as discussed in the Subsequent Draft EIR for the No Project Alternative and the use of the site as a community park, and implementation of this alternative is remote and speculative, further analysis is not required.

However, it should also be noted that the project proposal includes retaining a majority of the bluff face area as natural open space a (see Section II.D, Project Characteristics, on page 52 of the Subsequent Draft EIR) and implementation of a *Bluff Area Stabilization and Maintenance Program* (see Sub-Section IV.D.4, Mitigation Measures in the Plant and Animal Life Section, on page 153 of the Subsequent Draft EIR and the actual program which is provided in Appendix F of Subsequent Draft EIR Technical Appendix Volume 2).

Comment 16-2:

2. From reviewing the draft EIR on cultural resources, it is obvious that this site has many unique features and should be saved. It is especially important to save it as the other bluff sites of the UCLA Housing development, Catellus Development Corporation's Dunbarton Tract, and Loyola Marymount expansion have destroyed the other important sites. This is the last one.

Response 16-2:

See Response 15-12 regarding the impact on cultural resources.

Comment 16-3:

3. Already this special cultural site has not been treated appropriately. According to the Draft archaeological study, there was digging and excavation of the site to "salvage" artifacts as "mitigation" of the proposed development way back in 1987. This was done without an approved project and as far as I can see an approved mitigation plan, and without consultation with the Most Likely Descendant for this area for the Shoshone Gabrielino Nation, Chief Ya'Anna Vera Rocha. Why wasn't she consulted in 1987? Why aren't you consulting her now? The plundering of her cultural heritage is continuing the genocide perpetrated for centuries against her people.

   To avoid any further confusion in the future regarding this site, I am enclosing documentation as to who the Most Likely Descendant is for this area. I am sure the City is already aware of this because some of it is from the City. But I am enclosing it just so that there is no confusion as to who is the right person to contact for cultural resources.

Response 16-3:

There is no requirement that an excavation plan be "approved" nor that Most Likely Descendants (MLD) be notified prior to embarking upon an archaeological excavation. The issue of MLD is a component of California state burial law. An MLD is appointed on a project-specific basis by the Native American Heritage Commission to assist in decisions about the disposition of human remains and associated grave goods. The MLD has no standing under CEQA. However, CEQA noticing and public participation procedures allow and encourage public involvement, which would include Native American groups and individuals claiming an affiliation with the project site.

Comment 16-4:

4. We are requesting a public hearing this draft EIR. This is one of the most important sites left in Los Angeles and it deserves full public scrutiny. The public should be encouraged to bring forth as much information as possible. It appears to us, as I mentioned in my letter to request an extension of at least one week for comments

(attached) that there are attempts to manipulate the public process. It looks as if Catellus and Howard Hughes Properties are trying to steam roll the process due to their political power. Also, people in the community have reported to us that when they try to talk to government agencies, they are told "this development is going to go through anyway." This sounds just like the "Done Deal" propaganda that was used on the proposed Playa Vista project below on the wetlands.

We request that you respond to us in writing why there is no public hearing on this Draft EIR.

Response 16-4:

As stated in Section 15087(i) of the CEQA Guidelines, "Public hearings may be conducted on the environmental documents, either in separate proceedings or in conjunction with other proceedings of the public agencies. Public hearings are encouraged, *but not required* as an element of the CEQA process" (*emphasis added*). Therefore, a public hearing is not required. Further, as a matter of general policy, the City does not conduct separate hearings on EIRs. However, the comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

The CEQA Guidelines include requirements regarding the public review period for an EIR. Section 15105 (a) of the Guidelines states that "When a draft EIR is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 45 days, unless a shorter period, not less than 30 days, is approved by the State Clearinghouse." In addition, the same notice and public review period is required for a Subsequent EIR as for a Draft EIR per the CEQA Guidelines Section 15162 (d). The public review period for the West Bluffs Subsequent Draft EIR began on May 21, 1998 and officially ended on July 6, 1998, lasting two days beyond the required minimum 45-day review period. Comment letters were accepted and responded to in the Final EIR up to July 13, 1998, providing a total of 54 calendar days for public review and comment. Therefore, the public review period for the proposed project fulfilled the requirements of CEQA, and no extension is required.

CEQA also provides guidance regarding noticing the availability of the EIR to agencies and the public. Section 15087 of the CEQA Guidelines states that the lead agency must provide public notice of the availability of an EIR and that the notice "shall be mailed to the last known name and address of all organizations and individuals who have previously requested such notice *in*

writing" (*emphasis added*). Further, CEQA requires that notice shall be provided by at least **one** of the following procedures:

- Publication at least one time in a newspaper of general circulation in the area affected by the proposed project;
- Posting of notice on and off the site in the area where the project in to be located; or
- Direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the project is located.

Copies of the Subsequent Draft EIR were provided to those organizations and individuals that requested a copy of the document. Further, notice of the availability of the Subsequent Draft EIR was published on May 21, 1998 in the *Los Angeles Times*.

Comment 16-5:

5. We also are submitting documentation on potential problems regarding the storage of underground gas and gas escaping that could potentially impact this project. We are submitting a request for a Subsequent EIR on the proposed Playa Vista project below the bluff.

We sincerely hope that this time you respond to our comments.

ATTACHMENT: SEIR Request on Gas Problem

FRIENDS OF ANIMALS
Patricia McPherson
3749 Greenwood Ave.
Los Angeles, CA 90066

THE EARTH TRUST FOUNDATION
Andrew Beath
20110 Rockport Way
Malibu, CA. 90265

THE FUND FOR ANIMALS
Joyce Piper
23128 Bigler St.
Woodland Hills, CA 91364

REQUEST FOR A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT: PLAYA VISTA

Due to the formal approval of the first phase of the Playa Vista project, a Subsequent Environmental Impact Report (SEIR) is requested under California Environmental Quality Act (CEQA) guidelines. There is substantial new evidence to show the final EIR was insufficient in its environmental assessment of the Playa Vista project. New insights have emerged during investigation of this area (Ballona Wetlands) evoking revision of the original proposal. (County of Inyo v. City of Los Angeles (3d Dist. 1977) 71 Cal. App. 3d 185,199 (139 Cal. Rptr. 396).) (Laurel Heights 11 Dec. 1995)

Events have occurred to meet the circumstances requiring the preparation of a SEIR as quoted and noted in the next several passages, from the Public Resources Code Section 21166 and the Guide to the California Environmental Quality Act (CEQA):

"New information , [*sic*] which was not known and could not have been known at the time the EIR was certified as complete, becomes available." (Pub. Resources Code, 21166; see also CEQA Guidelines, 15162, 15163.)

"(4) mitigation measures or alternatives that were not previously considered would substantially lessen one or more significant effects on the environment." (CEQA Guidelines, 15162, subd. (a) (3) (B).)

"A SEIR must, of course, receive the same circulation and review as the previous EIR." (Discussion following Guidelines section 15162. Concerned Citizens of Costa Mesa v. 32nd District Agricultural Assoc. (1986) 42 Cal. 3d 929, 936 [231 Cal. Rptr. 748]; Mira Monte Homeowners Association v. County of Ventura (2d Dist. 1985) 165 Cal. App. 3d 357, 362-363, fn.7 [212 Cal. Rptr. 127].)

Agency decisions are to be founded on a reasoned evaluation of the relevant factors. Unfortunately, some of the information provided to the city [*sic*] of Los Angeles Planning Department pertaining to Ballona Wetlands was incorrect. Circumstances have changed

enough to justify repeating a substantial portion of the process regarding a health risk assessment addressing both human and wildlife associated with a potential ultrahazardous risk due to highly volatile and possibly carcinogenic natural gases that are seeping into the Ballona area at a significant rate.

RESPONSE REQUEST:

A written response is requested.

A meeting is requested between isotopic gas analysis experts, expert petroleum engineers (with a background in the migration of underground gas), spokespeople for environmental groups and community groups and, the City of Los Angeles Planning Department, Building and Safety, and any other pertinent public agencies.

Requested from the L.A. City Planning Department, is assistance in arranging that a spokesperson from the Ca. Division of Oil&Gas (Ca. Dept. of Conservation), is present at the above requested meeting. At the present time, the Ca. Div. of Oil&Gas is refusing to meet to discuss the topic of gas seepage at Ballona/Playa Vista.

Attached with the SEIR Request are SIERRA CLUB Resolutions 19, 20 from 1993. Public hearings regarding the nature and extent of the impacts upon and consequences for public health and safety, and on endangerment of wildlife, resulting from gas storage facilities and gas related impacts of oil drilling operations have still not taken place. (On file at L.A. City Hall)

Requests from local homeowner groups for public hearings regarding this matter have also been ignored to date. (Requests are on file at L.A. City Hall)

For the record, a rejection of this SEIR request and thereby lack of investigation of the gas seepage at Ballona/Playa Vista, needs to be accompanied by superior data and identified, recognized, expert testimony backing up that point of view. That information needs to be made available for peer review by the recognized experts in the field of isotopic gas analysis and recognized experts with qualifications in the field of underground gas migration hazards.

REQUEST SEIR SCIENTIFIC STUDIES

There is a prudent need to undertake an evaluation program including but not limited to soil sampling through a matrix grid system using probes and monitors to determine the origin and the extensiveness of the seepage before any building take place.

The city of Los Angeles is mandated to pursue obligations set forth in the 'R' book which outlines determinations of Risk Zones due to methane seepage.

The 1991 Uniform Building Code, Chapter 15 Methane Seepage District Regulations, Section 1501-1503 Potential Methane Zone are all available to implement study and mitigation measures.

ERRORS in the First Phase and Master Plan Drafts and Final EIR, Final EIR-May 26,1993: [*sic*]

RESPONSE W-24.7 (First Phase and Master Plan Drafts and Final EIR, Final EIR-May 26,1993 [*sic*]

1. (regarding the 1985 Fairfax explosion and fires) .."the most probable source of the methane gas was not an oil well, but rather decomposing organic matter near the surface."

2. (regarding Ballona/Playa Vista site) ... "A major geologic difference between the Fairfax area and the Playa Vista site is that, unlike the Fairfax area, the project site has no shallow zones and pockets of oil and shallow pockets of methane that can seep to the surface." ...

Both of these statements, we now know to be incorrect.
The city [*sic*] of Los Angeles and the Division of Oil and Gas have to date, adhered to the belief that the Fairfax incident was caused by bacterial origin. Conclusions of the Los Angeles City task fore [*sic*] that investigated the incident have now become known to be incomplete and incorrect. The conclusions of the L.A. City task force were determined before further scientific investigation and the final, definitive conclusions of the experts in the isotopic gas analysis field of science occurred.

Recently, a paper, SPE 26171 (Society of Petroleum Engineers, Inc.) Copyright 1993; which many public agencies, including L.A. City Planning, appear to be unaware, was brought to the attention of various people. This paper was presented to the SPE Gas Technology Symposium

held in Calgary, Alberta, Canada, 28-30 June 1993. SPE 26171 is included with this request. Page 343, is marked to indicate the data and information that precludes a bacterial origin of the gas in the hazardous Fairfax explosion and subsequent fires.

Isotopic Gas Analysis, which allows the fingerprinting of gas in order to determine its origin, has a very small world of experts. SPE 26171 was authored by some of these few experts. Martin Schoell, one of the authors of the paper is considered to be the founder of this science.

Any challenge of the definitive final outcome regarding the cause of the Fairfax incident, which is included in SPE 26171, would have to be accompanied and supported by data that would be reviewed by the recognized experts in the field of isotopic gas analysis.

(Attached is part of a letter that refers to the belief that the Fairfax gas was biogenic (decomposing organic matter near the surface) in origin. The letter was written by one of the authors of SPE 26171, D. Coleman. D. Coleman is the head of ISOTECH LABORATORIES.) [*sic*]

The City of Los Angeles and the State of California, Division of Oil and Gas seem to be under the false assumption that Isaac Kaplan (a recognized expert in the field of isotopic gas analysis and his company, Global Geochemistry Corp., who were involved in the Fairfax investigation) believes the Fairfax incident was caused by decomposing organic matter near the surface. He does not. In a recent videotaped session, done for a documentary, Mr. Kaplan states that the Fairfax gas was of the same origin as that in the underlying oil field.

The fact that a devastating explosion took place in Fairfax, whether of biogenic or thermogenic (deeper source) origin would still be devastating to the people that were permanently scarred. However, it is extremely important that the final investigation be recognized by the City of Los Angeles and various pertinent public agencies. For public safety, it is important to learn from past disasters, such as the Fairfax incident. It is important to prevent future disasters through prudent and reasonable scientific studies led by qualified experts in the pertinent field of study. It is important that the experts in the field of isotopic gas analysis be recognized and heard in order to help avert another potential disaster in the Ballona area. What occurred at Fairfax and the subsequent investigation is extremely pertinent to the Ballona/Playa Vista region.

Many of the same scientific experts that were involved in the Fairfax incident are now aware of information and scientific data, including isotopic analysis of seeping gas, from the Ballona/ Playa Vista area.

The experts all agree that the outcome of the analysis of the three samples of seeping gas from Ballona, only serve to show there is an obvious great need to do further studies at Ballona to determine the gas's origin and extent of migration before any development take place.

Not only is public safety an issue but also potential public liabilities. The City of Los Angeles has the responsibility to protect its citizens from the loss of public funding if someone is injured and sues the city. With the information now accumulated about the gas seepage at Ballona, The City of Los Angeles will be liable for potential punitive damages as well, due to the foreknowledge of potentially ultrahazardous conditions at Ballona. The City of Los Angeles also has the foreknowledge that the opinions of experts in the dangers migrating underground gas, warn not to build before responsible scientific studies of the area have been carried out to determine a safe course of action.

The second statement noted from RESPONSE W-24.7 ,[*sic*] stating there are no shallow zones and pockets of oil and shallow pockets of methane that can seep to the surface in Ballona Wetlands/ Playa Vista site, has also been proven to be incorrect.
Included with this request is the second isotopic analysis done of gas seeping out of the historic Ballona Wetland area. This analysis was done by D. Coleman at Isotech Laboratory. He believes this gas to be of thermogenic origin.
This gas as shown in the analysis has an extremely high methane content and as such is highly flammable, recent video documentation of the gas burning is available. This gas also has an extreme potential for explosion. Clearly, there are pockets of methane that are seeping to the surface.

Also included in this request, is a letter referring to a, small invitational, meeting that took place this year in Long Beach with the Division of Oil&Gas and several spokespeople from environmental groups. In that meeting, which was documented, the DOG reviewed video of the seepage at Ballona and reviewed the analysis and agreed that regardless of origin of the gas, that this area was of great concern.
During the meeting, one of the DOG officials stated that, (referring to the bldg. directly adjacent to one area of seepage) he would not work in that building, nor would he own it. It was also stated by a DOG official that, someone had not done their job (in reference to the construction of that building).

Factors involved which make Ballona/Playa Vista an area critical for study:

-New earthquake information pertinent to the Ballona/Playa Vista region

-Subsidence information pertinent to the Ballona /Playa Vista region

Ballona Wetland/Playa Vista site has at least three oil fields either under it or adjacent to it.
(1) Playa Del Rey field which now stores billions of cubic feet of natural gas, operated by the Southern California Gas Company.
(2) The Venice oil field which is a larger field than the PDR field.
(3)The Sawtelle oil field which ia [*sic*] a smaller field and had limited drilling operations.

-The nearby Englewood [*sic*] oil field has major documented leaks.

The region's historic oil fields have already been geologically compromised through oil drilling operations. The old drilling acts as a conduit to the surface. The technology to secure those conduits is ever changing as integrity of old well bores are breached over time. New and ever changing data proves that well integrity should never to be taken for granted. Included in this request is the paper by Chilingar, Endres, Robertson, and Gurevich documenting data on GAS MIGRATION FROM OIL AND GAS FIELDS AND ASSOCIATED HAZARDS.

Due to the very nature of the proposed Playa Vista construction being built on a historic wetland, there are possible biogenic, swamp gas, methane problems in this region. Likely, there are no single sources contributing to gas seepage problems that are so apparent in the area. This probability only serves to further indicate that studies need to be undertaken to determine the gas's origin and extent of seepage and how to provide for the safety of both people and wildlife.

Gas migration of many miles has been documented in numerous instances of disasters occurring in various parts of the U.S. Isaac Kaplan discusses on a video documentary, the incomprehensible, seemingly indiscriminate hopscotching of migrating gas that occurred and caused explosion and fire in a housing development.

The paper by Chilingar, Endres, Robertson, and Gurevich also documents various examples of gas migration hazards.

Dangerous migrating gas is clearly treacherous.

Response 16-5:

This comment and attachment pertain to the potential for escape of natural gas (methane) from beneath the adjacent Playa Vista site and a request that a Subsequent EIR be completed for the Playa Vista project. A discussion of the environmental process for the Playa Vista project is not part of the scope of this project. However, the following discussion is included below to respond to potential concerns regarding the potential for gas migration to impact the West Bluff's project site.

Gas migration is a potential concern where gas wells occur or where excessive amounts of organic materials are found (for example in landfills). The State of California, Department of Conservation records and mapping (DOG Map # 120 Playa Del Rey, April 29, 1998, at a scale of 1 inch equals 400 feet) have been reviewed for the project site, and found that no wells have been drilled on or directly adjacent to the project site. As such, the potential for gas migration from the Playa Vista site having an impact on the proposed project site is not plausible.

In addition, the subject site is underlain with Terrace Deposits with a minimal amount of soil cover. Organic matter that may produce gas such as peat are not known to exist in Terrace Deposits at the top of the mesa.

Comment 16-6:

ATTACHMENT: LETTER REQUESTING EXTENSION
Signed by: Kathy Knight

July 6, 1998

Spirit of Sage Council
1122 Oak Street
Santa Monica, CA 90405

RE: Draft EIR #91-0675-SUB (CD) (PP) (ZBA)
West Bluff of the Ballona Wetlands

I tried to call you several times this morning, but you weren't available. Also Friday was a holiday. So I am faxing this letter to you today to request that a 30 day, or at the VERY

LEAST a one week extension be given regarding the comments for the Draft EIR on the above mentioned project.

The reason I am requesting this is that I am very concerned that at a community meeting last Wednesday, I was shocked at the number of people living within 500 feet of this proposed project that had not received notices of this major impact on their neighborhood. They were not clear how they could review all the information, and get their comments in the next day. (Since it was a holiday weekend, it seemed impossible to mail them in time).

Some people who had already complained of a lack of notice told me that the "City" had told them that it was published in a newspaper so it didn't matter the residents were notified. But this seems ridiculous! How many people read every legal notice in every LA newspaper every day!

Response 16-6:

For an explanation of the CEQA noticing requirements and of the review period for the West Bluffs Subsequent Draft EIR, see Response 16-4.

Further, there is no requirement under CEQA that residents living within 500 feet of a proposed project be noticed directly (e.g., by mail) regarding the availability of the Subsequent Draft EIR. Therefore, per the requirements of CEQA, sufficient notice was provided to organizations and individuals of the availability of the Subsequent Draft EIR.

Comment 16-7:

It appears to me that there is an attempt by the developers, Catellus Development Corporation and Howard Hughes Properties, to deliberately leave people in the dark who might oppose this development. For example, they have created a "Steering Committee" of people who apparently have mostly traffic concerns, rather than residents that want to preserve this last open bluff top as an important part of the Ballona wetlands ecosystem. They hold meetings for this "steering committee" and don't invite other residents. They then hold this "steering committee" up to government officials as "representing the community" when they don't. They represent specific people in the community-not everyone.

Response 16-7:

The CEQA Guidelines (Section 15083) recommend that "Prior to completing the draft EIR, the lead agency may also consult directly with any person or organization it believes will be concerned with the environmental effects of the project." However, public hearings are not required as an element of the CEQA process (Section 15087 (i)). Public meetings were held by the applicant to solicit comments on the proposed project from interested organizations and individuals. From May 1997 through July 1998, approximately 30 meetings have been held to resolve community concerns. Moreover, steering committee meetings to discuss the concerns of surrounding residents regarding the proposed project were held in order to further involve surrounding property owners in the environmental process, not to reduce public involvement. As stated above in Response 16-4, proper notification was completed for the Subsequent Draft EIR, per the requirements of CEQA, to all interested organizations and individuals.

Comment 16-8:

What list did you use to notice [*sic*] residents within 500 feet of the proposed development?

Response 16-8:

As stated above in Response 16-6, there is no requirement in CEQA to notify residents within 500 feet of a proposed project.

Comment 16-9:

I understand that you have received at least one other request from a resident to extend the response period by 30 days for the same reason. I also am asking that you extend the response period by 30 days, and again, at the very least by one week. I look forward to your prompt response.

Response 16-9:

Please see Response 16-4, regarding extension of the public comment period.

LETTER NO. 17
Signed by: Peter T. Lauener, Vice President

July 6, 1998

Catellus Residential Group
5 Park Plaza, Suite 400
Irvine, CA 92614

RE: Comments on Draft Environmental Impact Report No. 91-0675-SUB (CDP) (PP) (ZBA), West Bluffs Project

Comment 17-1:

Catellus Residential Group, as owner, developer and applicant of the West Bluffs project, has reviewed the Draft Environmental Impact Report (DEIR) for it and believes the Report adequately analyzes the impacts of the project. We offer the following minor comments only as further refinement and clarification on the project:

1. After further review of the project Tentative Tract Map No. 51122, City of Los Angeles Planning and Zoning Staff have identified a need for a Minor Area Variance addressing the sizes of some of the open space lots proposed. An application is now being prepared and will be submitted to the City for hearing concurrently with the Tentative Tract Map. The variance application will allow consideration to be given to reducing open space lot widths and/or lot areas from the standards otherwise required by the underlying R-1 Zoning for residential lots. The proposed open space lots are configured to only include common slope areas and walkways and are not for residential purposes, therefore there is not a need for these lots to meet normal R-1 (residential) standards. Because these lots are to be dedicated for open space purposes only, the variance is considered minor. The Minor Area Variance should be considered as part of the project discretionary approvals and as part of the land use discussion in the DEIR.

Response 17-1:

This revised project information is acknowledged, and will be included as a minor modification to the Project Description, please see Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 17-2:

2. The DEIR in the Aesthetics and Views subsections of the Summary, Environmental Setting Overview and Environmental Impact Analysis sections refers to the existing condition of the project site as "open space". Catellus Residential Group believes "vacant land" is a more appropriate description of the existing condition of the site. The term "open space" is used frequently in official land use designations whether it be through zoning, specific plans, general plans, dedications or other similar regulatory documents. The concern here is that the use of this term in the DEIR may be construed to imply that the site has had such an official land use designation. This is not the case. The majority of the site has been officially designated Single-Family Residential or zoned R-1 since the 1940's.

Response 17-2:

The project site is currently vacant, privately owned property. Description of the property as "open space" in the Subsequent Draft EIR was not intended to indicate that the site is zoned, planned, or currently available for public use for recreational or park purposes, nor that it is available as a dedicated natural area. The R-1 zoning and residential plan designations for the site were discussed in Subsequent Draft EIR Section IV.H, Land Use, page 177. This comment will be forwarded to the decision makers for consideration in the reviewing the project proposal.

Comment 17-3:

3. The proposed Coastal Zone Boundary adjustment as noted on page 197 of the DEIR will increase the Coastal Zone in the project area by 2.7 net acres based on further refined calculations. The DEIR currently indicates the net increase to the Coastal Zone will be only 2.2 acres. This refinement now means the total portion of the project site within the Coastal Zone will increase from 11.95 acres to 14.65 acres.

We urge the City of Los Angeles to approve and certify the EIR and the project.

Response 17-3:

The change in the Coastal Zone boundary is acknowledged. See Section II, Corrections and Additions of the Subsequent Draft EIR, which includes updated acreages. This comment will be forwarded to the decision makers for their review and consideration in reviewing the project proposal.

LETTER NO. 18
Signed by: Fern Mathias

13 July 1998

Southern California AIM
P.O. Box 65155
Los Angeles, CA 90065

Comment 18-1:

The Southern California Chapter of the American Indian Movement would like to submit a letter of concern regarding the desecration of Native American village sites in the West Bluffs development project, Environmental Impact Report No: 91-0675-SUB(CDP)(PP)(ZBA). In reviewing the EIR submitted, we contend that it fails to address the cultural and environmental impacts of the project. The EIR advises that the destruction of Native American grave sites is justifiable when they hire a Native American to participate in the desecration themselves. This strategy has been used to pit traditional and assimilated urban Native Americans against each other. The inhumane and sacrilegious practice of removing or destroying Native American grave sites and villages is a common practice of the local, state and federal governments as well as private and public land owners. These types of customs will not be tolerated by the traditional Native American community nor by the National American Indian Movement.

Response 18-1:

Although CEQA recognizes avoidance of cultural resources as the preferred mitigative course, the law does provide for archaeological data recovery as a permissible vehicle for the mitigation of adverse impacts to archaeological sites when the undertaking will cause the destruction of significant resources. In the case of the West Bluff project, avoidance is not compatible with a viable development plan. Consequently, data recovery is viewed as the only mitigative alternative that is consonant with the project moving forward. The proponent recognizes the variation in beliefs and attitudes toward the destruction of archaeological sites within the Native American community. These sensitivities will be considered in the selection of Native Americans to monitor construction.

Comment 18-2:

We believe the West Bluffs site has been misrepresented by Mr. Van Horn in that he has ignored the cultural, archeological and environmental impact of this development. And that his report is not available to archaeologists and the Native American community at large. Previous archeological studies on this site show strong indication of permanent village, cemeteries, ceremonial houses, ceremonial areas and game courts which are sited as the last and largest relatively undisturbed village sites left in the Los Angeles Basin. The environmental studies show natural vernal pools, and plant resources that were utilized by the Native American communities. The indiscretionary practices of illicit development plans such as this have politically and culturally debased not only the Native American but also the American consciousness of the reverent and intellectual community as a whole.

Response 18-2:

Dr. Van Horn's report is available to the public as part of the environmental documentation provided with the EIR. The assertion that LAN-63 and -64 are the remnants of villages that contain cemeteries, ceremonial houses, ceremonial areas, and game courts is certainly a testable hypothesis that can be evaluated against the data already recovered from the sites. Other hypotheses, such as the use of the sites as temporary camps or seasonal base camps, are also plausible. Archaeological data recovery provides data that can be used to evaluate these and other hypotheses that are currently of interest as well as other hypotheses that may be devised in the future. However, the commentor's opinion is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

Please see Response 15-9 regarding the presence of vernal pools and biological resources.

Comment 18-3:

The American Indian Movement and its supporters do not support the EIR of West Bluffs project. This report fails to address the cultural and environmental significance of this area. We demand that the legal and appropriate measures necessary for protection of culturally significant sites under the California Environmental Quality Act be adhered to. We suggest that sincere measures be taken to avoid unnecessary desecration of Native American culturally significant areas through political and economic procedures such as legitimate community participation, identification and preservation of culturally and environmentally significant sites

for open space, prior to development plans to avoid immoral, illogical and anti-Native American communities.

Response 18-3:

As stated in the Subsequent Draft EIR, two archaeological sites on the project site are considered significant. The proposed treatment adheres to guidelines established by CEQA for the mitigation of significant cultural resources. The treatment is a sincere attempt to mitigate these effects, as evidenced by the comprehensive nature of data recovery already performed and the monitoring and reporting program integrated into the construction plan. However, the commentor's opinion is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

LETTER NO. 19
Signed by: Howard F. Towner, Ph.D.

July 5, 1998

8114 Westlawn Avenue
Los Angeles, CA 90045

Comment 19-1:

I am writing in reference to the draft EIR (EIR case #91-0675-SUB(CDP)(PP)(ZBA)) which was prepared for the proposed **West Bluffs project** (reference #9711105). This was titled by its authors as the "Subsequent EIR", apparently because an earlier EIR was completed several years ago.

My perspective on the proposed project comes from three sources: I am a resident of the area of the proposed project; I am a field biologist with over 25 years of experience and broad expertise with the flora and fauna of the local region; and I am a Board Member of the Friends of Ballona Wetlands, a nonprofit organization dedicated to the preservation and restoration of the Ballona Wetlands. The site of the proposed project is adjacent to those wetlands and its development could have profound effects upon them.

Response 19-1:

These comments are acknowledged for the record and will be forwarded to the decision makers for their review and consideration in reviewing the project proposal.

Comment 19-2:

The Subsequent EIR is based on several field surveys and reports which are included in the appendices to the main report. The primary individual reports are the following:

(1) Conel, Cheryl et al. November, 1989. "The Field Survey and Background Report for Hastings Canyon and Adjacent Area". Environmental Management Service.

(2) Planning Consultants Research. July, 1990. "Biotic Survey Report for the Hastings Canyon Study Area".

(3) Hovore, Frank and Associates. June, 1990 (rev May, 1993). "Hastings Canyon Biota Survey: Sensitive Species Inventory".

(4) Landry, Ross. November, 1989 and June, 1990. Two burrowing owl surveys of the La Ballona Bluffs.

(5) Planning Consultants Research. July, 1990. Biotic Survey Report for the Hastings Canyon Study Area. Planning Consultants Research. (This appears to be a summary of the previous field surveys.)

Response 19-2:

These comments are acknowledged for the record and will be forwarded to the decision makers for their review and consideration in reviewing the project proposal.

Comment 19-3:

I have several criticisms of these reports, some of which are major.

(1) **The field studies were incomplete.**

The project site was sampled in the spring (April and May, 1990) and fall (September, October and November, 1989), but **not in the winter and summer**. This led to incomplete data on species occurrences on the site.

The data in the **reports are based upon a mere 8 month period**, with gaps for December, January, February and March. For assessing the significance of this region for wintering birds and amphibians, **surveys must be conducted in those winter months**. These months are the peak period for wintering raptors in the Playa del Rey/Westchester area.

In general, several years of data must be evaluated to obtain an accurate picture of the long-term habitat values of any site.

Response 19-3:

Surveys were conducted on the project site over a (discontinuous) period of nine years, with surveys first performed in November 1989 and, most recently, in January 1998, as stated in Section IV.D, Plant Life and Animal Life, of the Subsequent Draft EIR. Additionally, PCR ecologists paid periodic visits to the project site during the late winter and early spring 1998 to survey site conditions following the intense rainy winter season. With regard to the presence of raptors and other birds on the project site, please refer to Responses 13-3 and 13-5.

Comment 19-4:

> **Wintering raptors frequently use the bluff tops** for foraging. Species observed on the site in the past, but which were not mentioned in the report, include: peregrine falcon, prairie falcon and turkey vulture (K. Dial and H. Towner, personal observations). The EIR reports did verify the presence, in small numbers, of northern harrier, black-shouldered kite, red-tailed hawk, Cooper's hawk and sharp-shinned hawk. In some years, when rodent populations are high, the **raptors are actually very common on the site**. The site supports the last remaining flat ruderal habitat in our local region and is important for the foraging activities of these birds. A minor error was the mention of the sharp-shinned hawk as only a migrant. That species also winters in the Westchester area in small numbers.

Response 19-4:

With regard to the presence of raptors and other birds on the project site, please refer to Responses 13-3 and 13-5.

Comment 19-5

> Small mammal trapping was carried out by Hovore on only 2 nights in April, 1990. Much more thorough sampling should have been performed because of the proximity of the site to localities for local endemic species (see Microtus californicus stephensi below).
>
> **The project area was only partially sampled.** Very little time was given to surveying the entire area. Most of the effort was spent on the 9 acres comprising Hastings Canyon. However, the project as a whole encompasses 44 acres.

Response 19-5:

As stated in the report authored by Hovore and Associates (1990) and included in Appendix F, Biological Resources Reports, in Volume 2, Technical Appendices, habitat evaluations for mammal species indicated only the potential presence of the Pacific pocket mouse (*Perognathus longimembris pacificus*) and no other species. Accordingly, surveys were conducted only for the Pacific pocket mouse. Hastings Canyon constituted the entire project site required to be surveyed at that time, and no other area was surveyed for this reason; the *present* project site encompasses 44 acres. It was noted by Hovore, whose findings were supported in subsequent surveys including those most recently conducted, that rodent populations across the project site appeared to be "severely depressed" as a result of the presence of red foxes and domestic pets from surrounding residential areas. No suitable habitat for other mammal species was observed along the bluff top or within the drainage; as the bluffs are proposed for preservation and restoration, no mammal surveys were conducted on the remainder of the 44-acre property for the Subsequent Draft EIR.

Comment 19-6:

> I could find no mention of any attempt to identify **vernal pool habitat** on the site. This rare habitat could have existed on the bluff top before disking became frequent. There is a depression on the site which could potentially have had that plant association in the past and which could be restored.
>
> For the above reasons, the individual reports and the Subsequent EIR **consistently undervalue the significance of the bluff top.**

Response 19-6:

Attempts by project biologists and regulatory agency personnel to identify vernal pools on the project site are discussed in Section IV.D, Plant Life and Animal Life, on pages 136-137 of the Subsequent Draft EIR. With regard to the potential historic presence of vernal pools on the project site, please refer to Response 15-9.

Comment 19-7:

(2) **The field studies were conducted in a non-representative time.** The sampling was done in 1989 and 1990, when the total precipitation for the rainfall year 1989-90 (July

1-June 30) was only **7.35", 49% of the average** for the L.A. Civic Center (Los Angeles Times, 7/5/98)! Moreover, that year followed three consecutive years of sub-average precipitation. For those four years, the **average rainfall at the Civic Center was 8.9", 59% of normal.**

Further, from NOAA records, the rainfall at Los Angeles International Airport (LAX), approximately 2 miles from the study site, was even lower than at the Civic Center. For the four years ending in the rainfall year 1989-90, at LAX the **average for those years was only 6.9"!**, 57% of normal.

These conditions constitute a drought. Under such circumstances, short-term field surveys are going to be misleading, since plant and animal populations will be much lower than normal.

Response 19-7:

Biological resource surveys of the project site were conducted during January 1998, as stated in Section IV.D, Plant Life and Animal Life, of the Subsequent Draft EIR, and additional periodic surveys were conducted by Planning Consultants Research (PCR) ecologists throughout late winter and early spring 1998 in order to survey site conditions during and following the excessively rainy season. Moreover, Section 15125 of the California Environmental Quality Act (CEQA) Guidelines provide only that "[a]n EIR must include a description of the environment in the vicinity of the project, *as it exists before the commencement of the project*," clearly indicating that *contemporaneous* physical conditions on and around the project site are properly the scope of an EIR.

Comment 19-8:

(3) **The reports are biased** toward minimizing the habitat values on the site, and therefore minimize the potential negative impacts of the proposed project. For example, Hovore's report recognized Cooper's hawk, black-shouldered kite and northern harrier as foraging over the project area, but asserted "that their use of the site would be transitory, as no population-supporting resources exist." (p. 9). These and other raptorial birds utilize the site year after year for wintertime foraging. **This is not transitory!** The assessment also assumes that the bluff tops will continue to be frequently disked, allowing no opportunity for vegetation to re-occupy the site. Plenty of rodent food would be available year-round if the area were to be left alone.

In another example of minimizing potential impacts, Hovore also comments on the **California horned lark**, a federal Category 2 subspecies which frequents grasslands, which was observed on the site: "Overall, habitat losses for this subspecies would constitute an incremental, locally important but regionally insignificant impact." (p. 9). This impact would actually **eliminate the bird from the local region** since the bluff tops on the project site are the last fragment of this habitat in the area. Another grassland species which might be eliminated is the **western meadowlark**, a species which has experienced major local habitat reduction.

Hovore also observed loggerhead shrikes, a Category 2 sensitive species, and a silvery legless lizard, a Los Angeles County listed species. He minimizes the effect of the proposed project on these species.

The Subsequent EIR summary of impacts on sensitive species in table 16 asserted incorrectly the **peregrine falcon** roosts in tall trees. This endangered bird generally nests on cliffs and buildings. It has been observed on the project site and adjacent to it in the Ballona Wetlands. Nesting has occurred in the Marina del Rey area, and individuals forage for small birds in open areas on the bluff tops and in the wetlands.

No account in the reports is given as to what the resident biota might be if the **regular weed control disking were terminated** and the area allowed to remain undisturbed. Under those circumstances, the faunal diversity and density would increase dramatically.

Response 19-8:

As stated in Section IV.D, Plant and Animal Life, of the Draft EIR, habitat values on the project site have been greatly reduced as the result of encroaching development and attendant direct (increased human and domestic pet presence) and indirect impacts (increased nighttime illumination and noise); site depredation by introduced species (red foxes and domestic pets); erosion due to urban runoff into Hastings Canyon; and regular disking of native vegetation for fire control. These conclusions were reached by numerous field investigators and regulatory agency personnel (US Fish and Wildlife Service, California Department of Fish and Game, and US Army Corps of Engineers) during surveys conducted over a number of years. The likelihood of higher biological resource values on the project site in the past is acknowledged but necessarily speculative, and, furthermore, is not required to be considered in analysis of project impacts. Section 15125 of the CEQA Guidelines require only that contemporaneous

physical conditions on and around the project site are properly the scope of an EIR. Under existing conditions, during the time of surveys, project site resource values were observed to be quite low and would likely degrade further as surrounding development continues. The project represents private property and as such is subject to ongoing maintenance requirements in compliance with City ordinances (e.g., regarding fire control), and, ultimately, development in some form. Such maintenance is unlikely to cease, given the project site's proximity to valuable, developed real estate.

With regard to the California horned lark, the range of the species includes the coastal areas and off-shore Channel Islands; while they may be uncommon in the project area, they are still relatively abundant in the southern California region. The western meadowlark also ranges throughout the state and will nest in scrub or shrublands where grasslands are less abundant. Moreover, ongoing disking activities are responsible for the presence of the non-native grassland and ruderal habitat on the bluff top during certain times of year; this vegetation does not represent sensitive or critical wildlife habitat for these or any other species.

Hovore (1990) acknowledged the presence of the loggerhead shrike in the project vicinity, although it is not indicated whether the species was observed on-site. Notwithstanding, the shrike utilizes scrub and wetland habitats, and would not be significantly impacted by project implementation. One individual of the silvery legless lizard was seen off-site during surveys performed by Hovore (1990), and the species was not observed to be on-site by Hovore or other subsequent field investigators. Restoration of the bluff slopes, in conjunction with planned restoration of the Playa Vista wetlands, would preserve and enhance existing habitat for this species. Similarly, the peregrine falcon would benefit from the planned restoration of the bluff slopes, which represent potential nesting habitat.

With regard to the duration of field surveys, please refer to Response 19-7.

Comment 19-9:

(3) [*sic*] **The individual reports vary in quality**. In the Conel report (#1), the errors of spelling and grammar are amazing for supposedly professional writing. Examples are "stripped"[*sic*] skunk (p. 7) and "sensative"[*sic*] species (p. 8' appendix, p.6), "one these biologically sound alternatives" (p. 13). This level of carelessness makes the entire report suspect. If the authors failed to spend adequate time proofing their report, could they have spent adequate time doing their field sampling?

(4) **The organization of the reports in the EIR is confusing.** The titles vary depending on where they are cited. It also appears that some of the pages became mixed up in the EIR.

Response 19-9:

The Subsequent Draft EIR preparers are not responsible for the quality of the previously prepared biological resource reports. The reports included in Appendix F, Biological Resources Reports, were reproduced from the Appendix to the 1993 EIR and appended to the Subsequent Draft EIR for ease of public review. It is acknowledged that some pages were out of order, although none were missing, in the original reports and reproduction into the Subsequent Draft EIR perpetuated these errors. Furthermore, pages 6 and 7, representing Figures 3 and 4a-b, were not reproduced into Appendix F of the Subsequent Draft EIR from the original report entitled *Field Survey and Background Report for Hastings Canyon and Adjacent Area* (Environmental Management Services, November 1989). However, the 1993 EIR and Appendices duplicated in the Subsequent Draft EIR, including all of the biological resource reports in their entirety, are incorporated by reference into the Subsequent Draft EIR and are available for public review at the City Planning Department. Regardless of spelling and grammar errors, the reports represent thorough, credible documentation of existing site resources and were prepared by experienced, credentialed field biologists. Please refer to Response 13-18 for further discussion of the adequacy of the Subsequent Draft EIR with regard to analysis of biological resources.

Comment 19-10:

(5) Some species which have been observed in the region were not seen or cited in the surveys.

Examples:

The western skink (*Eumeces skiltonianus*), slender salamanders (*Batrachoseps* sp.) and western toad (*Bufo boreas*) have been observed (H. Towner, personal observation) on the bluff face on the east side of Lincoln Blvd.[*sic*] in habitat much the same as on the project site.

No mention is made in any of the reports as to the likelihood of occurrence of the **Stephen's meadow vole** (*Microtus californicus stephensi*). This subspecies is a **narrow**

endemic once found only in a narrow strip near the coast from Sunset Beach to Pt. Mugu. It still occurs at the base of the bluffs near Lincoln Blvd. (H. Towner and B. Leatherman, direct observation 6/98; "Biota of the Ballona Region", Los Angeles County Natural History Museum Association, 1981). This rodent currently lacks legal protection, but because of its narrow and highly reduced range, it should be considered as a candidate for listing.

Response 19-10:

Section IV.D, Plant Life and Animal Life, summarizes the presence or absence of biological resources observed during site surveys conducted on the project site for this analysis, as well as those observed during surveys conducted over the last nine years. As stated above in Response 19-7, Section 15125 of the CEQA Guidelines clearly indicates that contemporaneous physical conditions on and around the project site are properly the scope of an EIR. Project implementation cannot be judged to impact resources which are not known or anticipated to utilize site resources. Species observed or anticipated to utilize bluff slope habitat, such as the species cited by the commentor, would benefit from bluff slope preservation and restoration.

With respect to the commentor's opinion regarding the suggested listing of Stephen's meadow vole, it is beyond the scope of this Subsequent Draft EIR to address such actions. As the species is currently unlisted, it is afforded no legal protections and, in any case, according to the commentor, apparently resides off-site at the base of the bluffs, which are proposed for preservation.

Comment 19-11:

(6) The 1990 PCR report does not cite the Los Angeles County Natural History Museum study of 1981. This is a serious omission, since that study should have been consulted for information on species occurring in the area only 8 years previous to the first of the West Bluffs studies.

Response 19-11:

The Subsequent Draft EIR preparers are not responsible for the quality of the previously prepared biological resource reports. However, the 1990 report, cites numerous, if not exhaustive, relevant references to support its conclusions.

Comment 19-12:

The Subsequent EIR is based on the above reports and continues their bias. I have several criticisms of the overall report itself.

(1) **The alternatives analysis in the Subsequent EIR is flawed**. To state first that the "No Project Alternative" is the environmentally superior alternative, eliminate that alternative and then state that the "Reduced Density Alternative" is the environmentally superior alternative is highly misleading (p. 7). The environmentally superior alternative is clearly "no project".

Response 19-12:

City and State CEQA Guidelines (Section 15126 (d)(2)) require the designation of an environmentally superior alternative. As stated in the Subsequent Draft EIR (page 420), "The No Project Alternative is considered the *overall* environmentally superior alternative, because it would reduce significant impacts with regard to air and noise (during the construction phase), and aesthetics and views, as compared to the proposed project" (*emphasis added*). However, as per the requirements of CEQA, if the No Project Alternative is the environmentally superior alternative, then an environmentally superior alternative must be identified from among the other alternatives. Therefore, the Reduced Density Alternative is the environmentally superior alternative.

Comment 19-13:

Unfortunately, some potentially less damaging alternatives which could be compared were not considered. For example, the "Reduced Density Alternative" does not preserve more open space, but instead merely has higher average lot sizes. A more desirable alternative would be to reduce the developed area within the project site and have a 1:1 or other ratio of development to preserved bluff top. The density within the developed portion could be adjusted as needed to provide the amount of housing desired.

Response 19-13:

In accordance with CEQA Guidelines Section 15126 (d), an EIR is required to "describe a reasonable range of alternatives to the project, or the location of the project, which would

feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project." As the proposed project would not result in significant impacts to biological resources, analysis of an alternative which includes preservation of more open space in order to avoid or substantially lessen such significant impacts would not be required. Further, the range of alternatives required within an EIR is governed by the "rule of reason" which requires an EIR to include only those alternatives necessary to permit a reasoned choice. The Subsequent Draft EIR included a discussion of six alternatives, four of which were analyzed in detail. Alternatives included the No Project Alternative, in which no development would occur, alternative site configurations, and a reduced density alternative. This represents a reasonable range of alternatives, and as CEQA does not require that the alternatives analysis be exhaustive, meets the intended requirements of CEQA.

Please see Response 1-2 regarding the ratio of acreage preserved.

Comment 19-14:

(2) The Subsequent EIR states that **mitigation of 0.9 acres (5:1 ratio) is required** on the bluff face (pp. 152-3). Much more than that should be restored to mitigate the negative effects of the proposed project. I believe that the developer has stated that more acreage will be restored, but this must be enforced as a legal condition.

Response 19-14:

Please refer to Response 1-2 for discussion of preservation, re-establishment and enhancement of the bluff slopes. The owner of the bluff face (possibly Playa Vista) will be responsible for maintenance of the bluff slopes, as a condition of project approval.

Comment 19-15:

(3) The proposed "Street A" providing traffic access to Lincoln Blvd. represents a **negative impact on the bluff face habitat**. This is especially true if the developer fails to provide an under-street access way for wildlife. The portion of the bluff to the south of "Street A" will be isolated from the remainder of the habitat on the bluff face. If the animal access way cannot be constructed and if "Street A" cannot be eliminated from the plans, the street should be placed at the southernmost boundary of the property where it will not fragment the bluff face habitat.

Response 19-15:

Please refer to Response 13-9 for discussion of potential impacts to wildlife habitat from construction of "A" Street access to the project site from Lincoln Boulevard.

Comment 19-16:

(4) The EIR states that the bluff face will be restored in coordination with the Friends of Ballona Wetlands and under the supervision of a qualified landscape restoration expert. I could find **no provision for *in perpetuity* monitoring** of this habitat in the EIR, only a short-term monitoring plan for the time immediately after restoration. A long term plan should be included in the EIR and legally required if the project is built. The Diegan coastal sage scrub formation is threatened in southern California and every step should be taken to ensure its enhancement and preservation. This habitat will require continual monitoring and perhaps thinning, since it is normally maintained by fire in its natural state.

Response 19-16:

As stated in Appendix A, Mitigation Monitoring Program, in Technical Appendix Volume 1, mitigation monitoring of bluff slope restoration encompasses preconstruction, construction and occupancy phases of the proposed project. See Response 1-2, regarding responsibility for mitigation monitoring.

Comment 19-17:

(5) The cumulative impact of the project on biotic resources is asserted to be minimal. Howard Hughes Corporation, its affiliates, its land purchasers and Loyola Marymount University have in recent years destroyed all other sites with similar upland habitat. Because the project site contains the **last remaining bluff top habitat** in the region, the cumulative impact of the proposed project could be disastrous for some local species of wildlife.

Overall, the Subsequent EIR states that the project implementation would result in "less than significant" impacts to biological resources. Further, it also states that no mitigation measures are required to reduce project impacts on biological resources. I dispute those claims and assert that the EIR needs to take into account historical conditions, potential habitat values if

the site were left undisturbed, and more alternatives to the project as proposed. The likely impacts of the proposed project are negative and highly significant.

Response 19-17:

Please refer to Responses 13-4 and 13-5 for discussion of the regional importance of the bluff top and the nature and condition of the remaining habitat it contains. Please refer to Responses 13-18, 15-9 and 19-8 for discussions of Subsequent Draft EIR's consideration of historic biological resource conditions on the project site, including native vegetation and vernal pools.

The project site, while acknowledged to be one of the last remaining undeveloped bluff tops in the project area, has nonetheless been determined by PCR biologists and natural resource regulatory agency personnel to possess low habitat values for a variety of reasons, including years of ongoing discing activities altering the topography and removing vegetation; human disturbance; depredation by red foxes and domestic pets; and other aspects of urban encroachment. While project implementation would remove non-sensitive habitat (i.e., grassland, ruderal vegetation and wetland vegetation) which is acknowledged in Section IV.D, Plant Life and Animal Life, of the Subsequent Draft EIR, to serve as habitat for sensitive, albeit unlisted, species, it would not result in significant impacts to any formally listed endangered or threatened plant or wildlife species or designated critical habitat. The bluff slopes contain the remnants of the sole sensitive plant community on-site and are proposed for preservation and restoration as required mitigation by the California Department of Fish and Game and the US Army Corps of Engineers for impacts to jurisdictional stream drainage and wetlands, including "waters of the United States."

G. INDIVIDUALS

LETTER NO. 20
Signed by: J.C. Anthes

July 2, 1998

7371 West 81st Street
Los Angeles, CA 90045

Comment 20-1:

I have reviewed the Environment Impact Report from the City of Los Angeles regarding the West Bluffs development.

My concern is that we need a minimum of three acres of open and recreational space on the West Bluff development as recommended by the West Bluff Steering Committee.

I strongly urge the Department of City Planning to implement this recommendation, not only for benefit of the development itself, but also for the benefit of the community surrounding the West Bluff development.

Thank you for your consideration of this recommendation.

Response 20-1:

Please see Responses 13-7 and 13-15 for discussion of open space and recreational use requirements for the proposed project.

LETTER NO. 21
Signed by: Gary M. Baum, D.D.S., M.S.

June 3, 1998

Westchester Medical Plaza
8540 Sepulveda Boulevard, Suite 1012
Los Angeles, CA 90045

To: Hadar Plafkin re: EIR Report No. 91-0675-SUB(CDP)(PP)(ZBA)

Comment 21-1:

I am a proponent of the proposed West Bluff Residential Development Project in Westchester. I am a business owner and a resident of the area. A development of this area will benefit the local community in many ways. It will help stimulate the local economy; and it will bring in a group of affluent homebuyers, which will be beneficial to the local economy. The sensitive environmental area located below this development will be further protected by the measures the developers are taking not only during the construction, but long term protective measures are being implemented as well. There will be public access, through a system of green belts and a park, to an area that is currently inaccessible to the general public.

The area as it presently stands is simply a vacant lot that benefits no one. It is not a natural area; it is simply an eyesore that is plowed every few months. This development will place on this property, which was zoned as residential many years ago, an attractive development that will benefit almost everyone. There is a significant environmental area below this development. The bluff face will remain untouched and the sensitive environmental area below will be not only protected but further enhanced. The construction has been carefully planned to further protect and enhance the wonderful natural area.

The Hughes Corporation and Cattelus [*sic*] Corporation have gone through extraordinary lengths to meet numerous times with the local community members in several forums devise [*sic*] a plan for this development. The local residents have shared in the planning for this development. The density of this residential development will be less than the existing neighborhood. The average lot size will also be larger than the existing neighborhood. The developers, through several meetings with the local residents, have developed a plan for traffic

mitigation, which will be an improvement over what exists now. This will further benefit the local community.

I feel I represent a large silent group of local residents and business owners who support this development, but have been intimated by a small vocal group who oppose this development based on mis-information and a lack of understanding of the facts.

Response 21-1:

This comment will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 22
Signed By: Joseph E. Berberich

7811 Beger Avenue
Playa Del Rey, California 90293

Re: EIR NO. 91-0675
West Bluffs Development-Tcntativc Tract NO. 51122

The following are comments regarding the above EIR:

Comment 22-1:

1. This project is being built in an area that is already very densely populated, with more density being planned in the development of Playa Vista. There should be more green belt areas in the project. There should be a walking/jogging trail along the entire length of the bluffs, with a green belt viewing area on the west end of the project were [*sic*] the view is most spectacular. The project currently plans the viewing area close to Lincoln Blvd., which is not satisfactory when compared to the much better view which could be obtained on the west end. The view close to Lincoln Blvd. would be a great view of the traffic on Lincoln and would be at a much lower elevation. There should also be at least four(4) [*sic*] acres set aside for open, grassy, park-like areas.

Response 22-1:

After distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified portions of the proposed site plan. Specifically the new site plan includes additional open space and reconfiguration of the pedestrian trail. As described in the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, the proposed pedestrian trail down the bluff face to Cabora Drive using the former radar/radio antenna site service road, has been eliminated. Access to Ballona Wetlands would be via the bluff path to the view park and then along "A" Street to Lincoln Boulevard onto Cabora Drive. The pedestrian trail is proposed to be extended to the west behind Lots 15 through 27 and Lots 45 through 50. See also Response 14-5.

In addition to changes in the configuration of the pedestrian trail, the applicant has modified the proposed site plan to include additional dedicated open space. The Subsequent Draft EIR indicated that approximately 16.75 acres of open space would be included as part of the project. The modified site plan includes 17.33 acres of open space, of which 1.96 acres would be dedicated as recreation/park use. As discussed in the Subsequent Draft EIR (page 290), the park requirements as established by Section 17.12 of the Municipal Code is 2.1 acres. Although the proposed changes increase the amount of dedicated park land, it is less than that which is required. Therefore if the project is approved, the decision makers may require additional land dedication, the provision of private park space for the residents, or the payment of in-lieu fees as mitigation for the proposed project. Please see the revised Project Description referenced earlier in this response, and Responses 13-7, 13-15, and 14-5 for a more detailed description of changes regarding the pedestrian trail and the additional open space as proposed under the modified site plan.

Comment 22-2:

2. This project is being built in an area which has some of the most spectacular views on the West side. The project should be scaled back to allow for view corridors.

Response 22-2:

Section IV.S, Aesthetics and Views, of the Subsequent Draft EIR, has determined that there would be significant impacts to views from some of the residences and public vantages south of the project site. Partial mitigation for these impacts includes pedestrian linkages which would allow access to the bluff edge and associated views to the north (see Responses 14-5 and 14-6). Project impacts to views from the residences along 80th Street would be slightly less, however, remain significant. The comment is acknowledged and will be forwarded to the decision makers for their review and consideration in reviewing the project proposal.

Comment 22-3:

3. Hastings Canyon is a habitat for wildlife and should not be filled in or built on.

Response 22-3:

The biological resource value of Hastings Canyon is discussed in Section IV.D, Plant Life and Animal Life, on pages 135-139 and 150-152 of the Subsequent Draft EIR, and is discussed in

greater depth in Appendix F, Biological Resources Reports, in Volume 2, Technical Appendices (see especially Hovore, 1990). Hastings Canyon contains no sensitive plant or wildlife species, nor does it provide habitat for such species, as determined by surveys performed in Hastings Canyon over the last nine years, most recently in early summer 1998. Though its origins may be fault-related, its present morphology is owed largely to the presence of a combination of storm water runoff from the site on top of the bluffs, runoff from limited portions of the immediate adjacent residential neighborhood, and limited "nuisance" urban runoff which is channeled into the canyon from the adjacent residential neighborhood. This runoff is periodic and no permanent surface water flow is present in the canyon; additionally, the sandy substrate is highly erosive and the unstable canyon slopes and edges preclude the establishment of much vegetation. The canyon is used for ongoing, illicit dumping at its headward end and contains a series of small concrete check dams which serve to impound water and support the growth of some riparian and wetland vegetation. Ornamental and non-native "weedy" species have aggressively colonized the canyon slopes and adjacent upland. Human and domestic pet intrusion is also evident throughout the canyon's length. Thus, the disturbed condition and diminished resources value of the canyon preclude significant impacts to wildlife or other resources from project implementation.

Comment 22-4:

4. The public should have access, at least by a walking trail, to the base of the bluffs.

Response 22-4:

Please see Response 22-1 regarding reconfiguration of the pedestrian trail.

Comment 22-5:

5. Homes should be set back further from the bluff face, so as not to destroy the natural beauty of the bluffs.

Response 22-5:

As stated in the Subsequent Draft EIR (page 80), the majority of the natural (bluff face would remain with implementation of the proposed project, and therefore no unique physical feature would be destroyed. As stated in Response 13-14, the proposed project setback from the edge of the bluff to the proposed homes (with yards) will range from 45 to 90 feet, with an average

setback of more than 65 feet. This structural setback zone is intended to allow for the natural weathering, erosion, and shallow creep of the slope. Further, the proposed measures to control the erosional problems associated with the project site would repair and enhance the bluff face.

Comment 22-6:

6. An outdoor recreational area, available to any member of the public, should be a required part of the development.

Response 22-6:

As stated in the Subsequent Draft EIR, the proposed project includes open space/public recreational areas as part of the development. In addition, after distribution of the Subsequent Draft EIR, changes were made to the proposed site plan that include increased open space/recreational areas within the site. Please see Response 22-1 for a description of the proposed open space areas.

Comment 22-7:

7. The developers should not be allowed to raise the land anywhere on the development higher than the current grade. If Hastings Canyon is filled in, homes should not be build on pads
higher than the existing grade. To do so would block more view.

Thank you for your consideration of the issues referred to in this letter.

Response 22-7:

The object of grading the project site is to prepare the site so that it meets with all the applicable provisions of the City of Los Angeles Building Code and Zoning Code, as well as seismic design criteria included within the Uniform Building Code. Filling of Hastings Canyon, which is the result of urban runoff and not considered a unique physical feature of the site, would be completed in order to stabilize the bluffs by correcting the existing erosional problems associated with the project site, enhance the bluff face, and facilitate site drainage.

In addition, the Subsequent Draft EIR included analysis of reducing the site elevation (Section VI., Alternatives). With implementation of this alternative, the average elevation of the site

would be lowered by approximately 20 feet in order to reduce the significant impacts to views associated with the proposed project. However, it was determined that this would not be environmentally superior to the proposed project as this alternative would not reduce significant noise impacts associated with the proposed project and impacts associated with air quality (construction), plant and animal life, transportation and circulation, and paleontological resources would be greater.

The Subsequent Draft EIR acknowledged that with implementation of the proposed project, views from homes located south of the site would be significantly impacted. These comments will be referred to the decision makers for consideration in reviewing the project proposal.

LETTER NO. 23
Signed by: Roberta F. Bissell

July 1, 1998

7532 W. 82nd Street
Playa del Rey, CA 90293

Ref: 97111005 WEST BLUFFS

Comment 23-1:

I have been asked to write to you to let you know my thoughts about the proposed development on the the [*sic*] land known as the West Bluffs, Los Angeles. I live just a few blocks from this land and am very concerned about what type of development is done on this vacant land.

First, let me say that I believe an owner has a right to develop their property without frivilous [*sic*] restrictions from neighbors, just because the neighbors were there first. You hope that whatever is built is done taking into consideration the neighbors [*sic*] concerns so that everyone walks away happy.

I feel that the Catellus Residential Group has done an excellent job of working with our community in developing a plan for the vacant acreage on the West Bluffs. We have all known for many years that eventually this land would be built upon. Now I think it is important to work with the developer to make sure that this new development fits into our neighborhood keeping the same look and quality that we now enjoy.

I have stayed in touch with the proposals through Catellus and I have found that they have made many, many concessions to the neighbors on 80th Street. The latest proposal shows that Catellus has gone a long way to please the neighborhood in Playa del Rey by keeping traffic diverted to Lincoln Blvd., by adding a walking trail for everyone to enjoy, and many other extras. The current proposal is very exciting. I am looking forward to another nice residential development for three reasons: 1) The hillside will be graded and will keep it protected from further erosion. 2) The size of the homes and the lots will add value to our current neighborhood [*sic*] 3) I would be interested in buying a home from Catellus.

If you have any questions, please do not hesitate [*sic*] to telephone me at (310) 348-9822.

Response 23-1:

The comment will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 24
Signed by: Theresa Brady

July 6, 1998

21721 SEATO St. #120
Chatsworth, CA 91311

Comment 24-1:

Three issues about the Bluffs project concern me: the erosion, which has not been addressed, the possibility of fill that has a fungus in it, and the fact that there are some suitable resources for the Federally listed endangered Southwestern willow flycatcher. I feel that even if resources on site "are minimal" P. 144 for an endangered species, they should be protected. The definition of endangered is on the brink of extinction therefore it seems that even minimal habitat should be protected and approached with caution and concern.

Response 24-1:

Please see Response 24-3, below, regarding onsite soils. Suitable habitat for the southwestern willow flycatcher is characterized by the presence of *dense* riparian habitat (e.g., cottonwood-willow riparian forest) with surface water either present or nearby, or saturated soil. Hastings Canyon contains only a few willow trees, likely present due to the direction of "nuisance" runoff into the canyon from the adjacent residential neighborhood, and no permanent surface or near-surface water flow. Habitat evaluation for this species in the canyon led to the determination that focused surveys for the species were not indicated. The use of the term "minimal" to characterize species habitat in Section IV.D, Plant Life and Animal Life, of the Subsequent Draft EIR, was intended to convey the determination that minimal necessary elements of the habitat were present (e.g., water, dense habitat) and not that a minimal area of suitable habitat was present. Clearly suitable habitat exists for the species in the adjacent Ballona Wetlands. Areas of critical habitat for this species have been designated by the US Fish and Wildlife Service and are predominantly riparian woodland associated with major rivers and streams in southern California.

Comment 24-2:

Page 131 of the EIR seems to be the only place where erosion is even considered. The unsubstantiated comment that the area "is not subject to mudflow hazard" is an inadequate assessment of the situation. Since a geologist friend mentioned that erosion of sandy soil is quick, there should be study of recent years [*sic*] erosion speed, as well as how water from yard water use and rain in the future would affect these bluffs. This seems especially important in view of the recent hillside degradation in Malibu due to rain. The safety of the potential residents of those homes could be at stake. It would be horrible waste of natural land to have built homes that a few years from now have to be removed due to geological conditions.

Response 24-2:

The project will be subject to the requirements of City engineering staff and the project geotechnical reports. Specifically, mitigation measures for the proposed grading scheme are included in the following reports which were reviewed and approved by the City of Los Angeles Bureau of Engineering: *Geotechnical Investigations and Grading Plan Review, Tentative Tract 51122, West Bluff Property, Westchester Area, City of Los Angeles, California;* Pacific Soils Engineering, Inc., July 7, 1997 and *Grading Plan Review, Tentative Tract 51122, West Bluff Property, Westchester Area, City of Los Angeles, California;* Pacific Soils Engineering, Inc., February 11, 1998. These measures include a large setback from the bluff face to the rear property lines of the lots at the top of the slope. All drainage from the bluff top area is proposed by project design to be diverted away from the bluff edge. Further, a drainage bench at the top of the slope will intercept and redirect storm water run-off via non-erodable devices to approved disposal areas. The natural bluff face is to be vegetated with native vegetation to reduce the amount of erosion from storm water falling directly onto the bluff slope. These measures will reduce erosion over current conditions, and have been approved by the City of Los Angeles Bureau of Engineering and Department of Building and Safety to mitigate any potential erosion or slope stability problems.

Comment 24-3:

A recent article in the Times also draws attention to the lack of sensibility of altering landscape by importing fill dirt. In Canoga Park a home was rotted by a fungus common in the Southeast which destroyed a whole room of a house and caused it to fall. Where would the fill dirt be imported from and could you ensure that it would not contain this fungus?

Response 24-3:

Implementation of the project as proposed in the Subsequent Draft EIR (page 75) would have required an excavation and fill program to result in the export of earth from the site. No import of earth was required. Similarly, the revised grading program (see Section II, Corrections and Additions to the Subsequent Draft EIR) would require the export of earth and no import.

LETTER NO. 25
Signed by: Roberta Burmeisteri

June 22, 1998

7422 West 80th Street
Los Angeles, CA 90045

Comment 25-1:

We have read the Environmental Impact Report No. 91-0675-SUB-(CDP)(PP)(ZBA) on the West Bluffs Development and have listed items that concern and disturb us. We have been residents on 80th Street for 43 years. We will certainly be affected by the construction, not mention [*sic*] the loss of our view we have enjoyed all these years.

Response 25-1:

The Subsequent Draft EIR analyzes a range of impacts associated with construction of the West Bluffs project, including impacts on views enjoyed by the neighboring residences. The impacts from construction are discussed in Sections IV.B.1, Air Quality, IV.F, Noise, and IV.N.1, Traffic and Access. Impacts on views are discussed in Section IV.S, Aesthetics and Views.

Comment 25-2:

"Utilities" p20 "shall be placed underground where practical"? p.43 "utilities shall be placed underground", from a visual perspective we do hope all utilities will be underground.

Response 25-2:

The Subsequent Draft EIR has identified the placement of existing and new utilities underground as a mitigation measure in Section IV.S, Aesthetics and Views (see Subsequent Draft EIR page 365). The similar mitigation measure in Section IV.D, Plant Life, has been eliminated. See Section II, Corrections and Additions to the Subsequent Draft EIR. Enforcement of mitigation measures is discussed in the Mitigation Monitoring Plan, Subsequent Draft EIR, Volume 1 of the Technical Appendices.

Comment 25-3:

"Length of construction" p26. We are very concerned about the noise and dust for this long period of time. Do hope you will do all you can to remedy the problem.

Response 25-3:

Sections IV.B.1, Air Quality and IV.F, Noise, of the Subsequent Draft EIR, have identified mitigation measures to reduce environmental impacts associated with construction. While these measures will reduce construction impacts both sections identify that significant impacts would still occur during construction, but would stop with the completion of construction.

Comment 25-4:

Additional projects p.69 "projects to be developed in the area will certainly make too much traffic for the existing streets with the adding of 316 (from 31 homes) daily trips as stated on p.230. Projected traffic additives [*sic*] (p 252) should also take into account future traffic from new homes being built west of Berger in Playa del Rey (on Hughes lots and gas company properties) who will be using 80th Street. Also traffic from "Related Projects" p 243 of 23 new developments in the general locality. In no way should it be called "negligable." [*sic*] We think this all should be looked at more closely and maybe scaled back in light of the cumulative impact.

Response 25-4:

The effects of the project's traffic on all of the nearby residential streets, including 80th Street, are included in the Subsequent Draft EIR in Table 34 (page 253) and are less than significant. The traffic effects of the 23 related projects are accounted for directly in this analysis, and the potential cumulative traffic from new homes west of Berger Avenue (individual homes on individual lots located throughout the area) has been included by way of the assumed ambient traffic growth factor which is built into the traffic model. The traffic impacts noted as "negligible" in Table 34 refer to the impacts of daily project traffic, not impacts of cumulative development traffic. For more information, see Table 10, page 44 and Table 11, page 45 of the Traffic Study contained in Volume 2 of the Subsequent Draft EIR Technical Appendix.

Comment 25-5:

p. 202 "The proposed project site is surrounded by similar residential land in which roadways and public facilities are already in place to support the project." Roads are not wide enough. There is now no parking on the east side of Rayford and the north side of 80th Street. Also 83rd Street is much to narrow between Rayford and Lincoln.
p.222 "on street parking is generally prohibited on Lincoln" [*sic*] There is parking on Lincoln now just north of 83rd to Manchester, except early morning and evenings. If they enforce no parking at all times, where will the customers find parking. If there is no parking the businesses will go out of business.

Response 25-5:

The roadways surrounding the project site, and in particular those within the neighborhoods to the west, south, and southeast are typical of residential areas, and range from approximately 30 to 36 feet in width. All of these roadways are sufficient to accommodate the traffic expected from the proposed project, as described in Section IV.N.1, Traffic and Access, of the Subsequent Draft EIR. See also Response 25-4.

The commentor is correct with regard to non-peak hour parking on Lincoln Boulevard from immediately north of 83rd Street to Manchester Avenue. With the exception of a short portion of "No Parking" restrictions on both sides of Lincoln Boulevard from approximately 85th Street to Manchester Avenue, to accommodate a proposed southbound right-turn lane as part of the Neighborhood Traffic Improvement Program, no change in Lincoln Boulevard parking is proposed in this area by the project.

Comment 25-6:

"Housing construction" p. 235 "equipment trips during construction would be sporadic and would include occasional cement trucks and lumber hauling vehicles. Employee trips are estimated at approximately 400 per day". I am sure the impact will be more than "minimal and less than significant," most likely very disturbing.

Response 25-6:

The commentor's opinion is noted for the record. The construction traffic estimates are fully described in the Subsequent Draft EIR, and are based on the assumed market-dependent

demand, estimated at 48 homes per year. Housing construction traffic will use "A" Street (once it is constructed) to access the site whenever possible, minimizing the construction traffic effects on the surrounding neighborhood. Construction-related vehicles will park within the project site, whenever possible, to avoid neighborhood parking impacts. However, it should be noted that construction traffic may use Rayford Drive, and 80th Street during construction of the 29 homes proposed along those streets. See Section II, Corrections and Additions to the Subsequent Draft EIR, for a new Transportation and Circulation mitigation measure regarding construction traffic.

Comment 25-7:

"Environmental Impact" p 353 and p. 41 "the development would significantly impact views of the sight and beyond as seen from these homes (80th Street) and from other public vantages to the south of the project sight". [*sic*] "It will detract from the existing aesthetic resources of the area."

p. 354 "Project development would obstruct valued views of, on and off, sight aesthetic resources from public or private vantages or implementation of the project would conflict with city or other applicable regulations relating to view resources and/or the height and bulk of structural elements proposed by the project are not compatible with existing development in the project vicinity" [*sic*] We don't see them as compatible to the homes to the south of the project.

We are sure that they will probably decrease the value of our property, due to loss of open space and view and more traffic.

Response 25-7:

Section IV.S, Aesthetics and Views, of the Subsequent Draft EIR (pages 358 and 359) determined that, although proposed residential uses on the project site would comply with existing land use regulations governing development of the area, including view resources, project-related impacts on views available to residences located south of the project site would be significant.

As discussed in Section IV.N.1, Traffic and Access, of the Subsequent Draft EIR, analysis of neighborhood traffic impacts were found to be less than significant; nonetheless, mitigation measures have been proposed to further reduce impacts.

As discussed in Response 17-2, the proposed project site is not officially designated as open space and represents private property.

The proposed residential units are expected to be of comparable or greater price than existing units and are not, therefore, anticipated to negatively impact the economic value of homes in the project area. Moreover, analysis of impacts to an individual property's economic value is beyond the scope of the Subsequent Draft EIR and is not required by CEQA. Impacts that are exclusively economic in nature, such as the diminution of property values, do not qualify as "significant effects on the environment" requiring EIR analysis. As articulated by the California Court of Appeal:

> The environmental protection acts . . . are not designed to protect against the . . . decline in commercial value of property adjacent to a . . . project. Rather the acts are intended to ensure consideration of qualitative environmental factors as well as quantitative economics in proposed actions affecting the environment.
>
> *Hector v. People of the State of California, 58 Calliope.3d 653, 656 (1976).*

Comment 25-8:

Vermin: We are very concerned that the disturbance of the field due to construction will create a virtual invasion of vermin (mice, gophers, snakes, red ants, spiders [*sic*] and what ever else that live there for all adjacent property owners.

Response 25-8:

A project mitigation measure has been added, requiring adherence to the Applicant's Required Construction Practices. As part of this, a vermin abatement program will be submitted to the community for input prior to construction activities. See Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 25-9:

Enclosed are some pictures of the views seen from our house

Response 25-9:

Receipt of the photographs is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

LETTER NO. 26
Signed by: Carrie Camilleri

July 8, 1998

8005 Rayford Drive
Los Angeles, CA 90045-2424

RE: E.I.R. 91-0675
West Bluffs Development-Tentative Tract No. 51122

Comment 26-1:

Thank you for the opportunity to communicate our concerns over the impending development of the West Bluff above the Ballona Wetlands.

I am not going to try and pretend that I know anything about E.P.A. and Coastal Commission regulations or the platforms of council members in our area. I am not politically motivated, even writing this letter is an unusual action on my part, however, I feel I must voice my objections to this project, and I must admit mostly for personal reasons.

Mr. Plafkin, I lived directly across the street from the area in question. I don't know of too many people in Los Angeles neighborhoods that can boost [*sic*] waking up in the morning and looking out your front window to see whooping cranes, red fox and various other kind [*sic*] of wildlife. I enjoy the peacefulness and the awesome view afforded to us of the city lights in the distance. In the wintertime when the grass is beginning to grow back in, there isn't anything more tranquil than taking my dogs for a walk in the field. When I reach the edge of the bluff looking out over the beautiful Pacific ocean, [*sic*] I sit down and pray and thank God for this open space He has provided for our enjoyment. One of the reasons my husband and I decided to purchase the property and reside in this area was because of this unoccupied area, there isn't much of it around anymore.

Okay, all of these reasons sound pretty selfish and really do not have any bearing on some corporation making another zillion dollars developing the West Bluff, but somehow I feel there is something really special and unique about this empty field. It is powerful in its presence, it is magnificent in its beauty, it is a small part of America in its purest form. Untouched, unspoiled, simplistic. Can't we just save one small empty field in this area for the wildlife and

for the current and future generations to enjoy. To let dogs run free in the field, an area where you can go sit and pray and no one cares. Do we really need another overpopulated, congested area where the only place to look out over the ocean is between two houses?

I have no idea how this letter will impact anything, but please take into consideration that we can build over nature in a small span of time, but to replace the nature we took away can take lifetimes, if it is even possible.

Mr. Plafkin, I will begin to pray for you and your department to have wisdom and discernment in the decision that has been entrusted to you concerning the West Bluff. You definitely have a difficult job handling such a delicate issue as I know there is much opposition regarding this bluff. I hope that I can be an encouragement to you by suggesting a few chapters in the Bible on wisdom; Proverbs 8 & 9 and the end of Ecclesiastes, chapter 12:9-14.

May God bless you and keep you in all your ways.

Response 26-1:

This comment is acknowledged and will be forwarded to the decision makers for their consideration.

LETTER NO. 27
Signed by: Bruce Campbell

July 9, 1998

614 Gretna Greenway
Los Angeles, CA 90049

RE: West Bluff Project

Comment 27-1:

I strongly oppose the substantial housing development planned for the West Bluff near Lincoln Blvd.

Besides it being another sizable development proposed for the already overburdened LAX to Westside Area, my main concerns with the project are:

1. The vernal pools will be destroyed – and don't let project proponents define them out of existence; I know there are seasonal wetlands present which must be protected.

Response 27-1:

Please refer to Response 15-9 for discussion of the absence of vernal pools from the project site. Further, the legal definition of vernal pools is contained within Section 404 of the Clean Water Act and serves as the basis for determination of the presence of jurisdictional determination on the part of the US Army Corps of Engineers (Corps). Additionally, the presence of recognized vernal pool species which are formally listed as endangered or threatened in accordance with the federal Endangered Species Act of 1973 would be the basis for invocation of US Fish and Wildlife Service jurisdiction. While it is acknowledged that a vernal pool *may* have been present on the project site in the past, such supposition is not within the scope of the Subsequent Draft EIR and conclusive determinations on the part of Planning Consultants Research (PCR) biologists and the Corps, based on legal and biological parameters, is that no vernal pools or other wetland resources remain or currently exist on the project site in the area of the topographic depression in question. Any water impounded in this area may have constituted a temporary "puddle" and may also have served as a wildlife

resource, but does not meet the Corp's jurisdictional requirements for a regulated wetland, including a vernal pool, and thus, does not constitute a vernal pool.

Comment 27-2:

2. There should be respect for the two Gabrielino Shoshone Village sites which used to be on the proposed West Bluff Development as proven by 40,000 artifacts dislodged from the area. There are likely burial sites here as well.

Response 27-2:

Scientific evidence suggests the commentor's assertions that the archaeological sites (LAN-63 and LAN-64) are the remains of villages affiliated with the Gabrielino Indians are in error as the archaeological sites predate accepted dates of the entry of the Gabrielino in the Los Angeles Basin. Therefore, the ethnic identity of the sites' users is unknown and results of the intensive investigations indicate the sites were used by only a few people at a time and that neither site is a village. However, due to the cultural sensitivity of the two sites, the proposed project includes mitigation measures to ensure proper treatment of human remains and cultural features. Further, the proposed mitigation of the two significant cultural resources, LAN-63 and -64, meet and exceed CEQA standards.

Comment 27-3:

3. The report on the project either did not look very hard or looked during the wrong time of the year to find such rare native plants as annual deerweed which I know inhabits the area.

Response 27-3:

No sensitive plant species were observed on the project site. The common upland species deerweed (*Lotus scoparius*) was observed on-site, as is noted in the report prepared by Hovore (1990, revised 1992) contained in Appendix F, Biological Resources Reports, in Volume 2, Technical Appendices. This is not, however, a sensitive species, and PCR is unaware of any sensitive species commonly referred to as deerweed which may be present on the project site, as cited by the commentor.

Comment 27-4:

4. The blufftops and bluffs are very important because they (as well as the abused Wetlands to the north) comprise essential habitat. Major development in the area would doom plants and most animals and reptiles at the blufftop, as well as severely strain those creatures which prefer the Bluff as habitat. Some of these critters have relocated lately due to the destruction of the willow grove/seasonal wetland which was a sanctuary for some species listed under the endangered species act. 67 species are admitted to be in the area – I don't think that it is much of a mystery how these creatures would vote about how their habitat is being threatened from many sides.

Thanks for your attention and please turn down the very threatening West Bluff development proposal.

Response 27-4:

Please refer to Responses 13-3 through 13-6 for discussion of the sensitivity of resources on the project site. While project implementation would undoubtedly displace or eliminate wildlife species from the project site, the species impacted either do not represent sensitive species or are not significantly impacted by the removal of habitat represented by the project site. While displacement and elimination of habitat on the project site is clearly an impact on the wildlife utilizing those resources, the federal and state Endangered Species Acts only provides legal protections for those species, or critical habitats for those species, which are either formally listed or candidates for listing as endangered or threatened (or rare, in the case of the state). Loss of non-sensitive resources is not considered a significant impact in accordance with this legislation or the regulatory agencies with administrative responsibility for promulgating and interpreting this legislation.

LETTER NO. 28
Signed by: Judith A. Ciancimino

June 15, 1998

7355 W. 83rd Street
Westchester, CA 90045

RE: 97111005 WEST BLUFFS

Comment 28-1:

I have been an active member of the West Bluffs' Steering Committee. As such, I commend the Catellus Residential Group for their ongoing community outreach efforts. As a result of my involvement, I feel the proposed West Bluffs homes will enhance our community. I believe we will one day point with pride to the West Bluffs' homes as a well-planned extension of our community.

I am especially pleased with Catellus' plan to keep the Westchester/Playa del Rey Bluffs in their natural state. Their commitment to the existing community is demonstrated by the myriad traffic mitigation measures to which they have agreed. Also, including a bluff trail and incorporating a view park benefits the existing neighborhood's enjoyment, as well as, that of the new West Bluffs homeowners.

Please add my name to the list of supporters for the west Bluffs project.

Response 28-1:

This comment expresses support to the proposed project and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 29
Signed by: James R. Conley

July 5, 1998

8011 Rayford Drive
Los Angeles, CA

Comment 29-1:

My name is James Conley. I live at 8011 Rayford Drive, which is directly across from the proposed "West Bluffs" development, tentative tract No. 51122. I have been a Westchester resident since 1945. I have lived in my present home since 1958. Several years ago we added a second story to our home in order to take advantage of the view of the city and the open space which supports numerous flora and fauna that live in the field.

For the past thirty years we have watched our neighbors and other [*sic*] make daily and/or weekly treks into the field to take advantage of one of the last open spaces on the West Side of town. We expected that some day that a developer or developers might acquire property. It was always our hope that it might be snapped up by the city or county of Los Angeles for a park or better still [*sic*] golf course. We always believed that due to the value of the property that if it ever was sub-divided that it would be done in a tasteful and considerate manner.

Response 29-1:

The Subsequent Draft EIR, Section IV, Alternatives, included an analysis of an alternative use for the proposed site as a community park. However, the alternative was eliminated from consideration as there are no proposals to purchase the site from the applicant for development of a community park or open space. The comment is noted and will be forwarded to the decision makers for consideration in reviewing the project proposal.

Comment 29-2:

On the contrary, we are faced with a developer that plans to build an ugly tract of two story houses that will totally obstruct our view, negatively impact the resale of my property and ruin the quality of my family's life. In the E.I.R. prepared for and paid for by the developer the author states that views from the south (our views) would not be seriously impacted.

Response 29-2:

As stated in the Subsequent Draft EIR (Section IV.S, Aesthetics and Views), it was recognized that the proposed project would result in significant view impacts for uses south of the project site. Please refer to Response 25-7 for discussion of project impacts on regarding views and property values.

Comment 29-3:

We attended several meetings chaired by representatives of the developers. They smiled and assured us that they wanted input from the local residents. When we mentioned our concerns, we always got answers that shifted the blame to "the coastal commission" or the city planning commission. Not [*sic*] they are asking for variances from each and every regulatory body that exists so they can maximize the profit here and run off at [*sic*] ruin some other neighborhood.

Our local councilwoman, whom I twice helped to elect doesn't attend our meetings, so we have to assume she prefers the support of the Real Estate lobby.

In any event, We [*sic*] the residents most affected by this nightmare are unanimously opposed to this ugly, tasteless development of a precious piece of open space.

Response 29-3:

This comment has been noted for the record and will be forwarded to the decision makers for their consideration.

LETTER NO. 30
Signed by: John Davis

July 7, 1998

P.O. Box 10152
Marina del Rey, CA 90295

Re: Comment/ West Bluffs Project Subsequent Draft Environmental Impact Report

Comment 30-1:

Please find below my comments on the Draft Environmental [*sic*] Report.

1. The language contained in the report is incorrect in several aspects. The word restoration is used incorrectly in relation to construction to be performed on the bluffs. Restoration is not possible. Erosion gullies or ditches are natural features commonly referred to as canyons and streams which do not need to be repaired.

Response 30-1:

While erosion is a natural phenomenon, accelerated erosion of the project site's drainages, especially Hastings Canyon, is caused by previous grading of the bluff top and consequent concentrated storm water surface flow across the bluff tops and into the drainages, as stated in Section IV.A.1, Grading, on pages 71-72 of the Subsequent Draft EIR. Excessive erosion has caused elevated sedimentation rates in the wetlands at the base of the bluffs, negatively impacting habitat quality in that area. While a certain amount of bluff slope erosion is to be expected under normal conditions due to the poorly cemented, sandy bluff substrate, and recognizing that wetlands function as natural sediment filters for eroded upland materials, nonetheless correction of the drainage problem and corrective grading of the bluff is anticipated to halt the present high rate of sedimentation of the wetlands and represent a beneficial project impact.

Comment 30-2:

2. Page 4, section D should also identify safety and seismic hazards as areas of controversy.

Response 30-2:

Section I.D, Areas of Controversy of the Subsequent Draft EIR, refers to the main areas of controversy as identified from verbal and written public comments received on the proposed project, and does not limit the environmental areas discussed in the document. Further, seismic safety hazards were discussed in Section IV.A.2, Geologic Hazards-Seismicity, of the Subsequent Draft EIR.

Comment 30-3:

3. Page 6, section 6, no consideration is made to preserve the site in its natural state as a wildlife refuge. Further analysis is required.

Response 30-3:

The Subsequent Draft EIR included analysis of the No Project Alterative, which represents the project site continuing in its present state. Please see Response 16-1 regarding the suggestion of preserving the project site as natural open space.

Comment 30-4:

4. Page 7 item 8. No beneficial impacts in drainage control or traffic flow would be realized by this project. Hastings Canyon is a natural feature and is an important part of the entire eco-system.

Response 30-4:

The biological resource value of Hastings Canyon is discussed in Section IV.D, Plant Life and Animal Life, on pages 135-139 and 150-152 of the Subsequent Draft EIR, and in greater depth in Appendix F, Biological Resources Reports, in Volume 2, Technical Appendices (see especially Hovore, 1990). Please also refer to Responses 22-3 and 30-1 for discussion of the erosional nature of the canyon.

Comment 30-5:

5. Page 5 Item f, 4,a,1 Grading. Insufficient data regarding slope stability is presented. Included with this letter is a USGS Debri flow hazard map for the LA westside which indicates a danger of debri [*sic*] flow on the bluff.

Response 30-5:

Debris flow would be mitigated and slope stability assured through the grading design requirements addressed in Response 24-2. The bluff is considered to be grossly stable, and as indicated previously, several measures are being undertaken to improve the surficial stability of the bluff and to assure the safety of the proposed homes.

Comment 30-6:

6. Page 11 item 4 a.2. No mention or assessment of the known faults which have been mapped and exist below the site have been addressed. The CA. [*sic*] Dept of Mines and Geology will be releasing new Hazard Zone maps for the Venice Quadrangle in September. The new data that is introduced in regard to faults and hazard must be included in the EIR. No data has been included in the EIR denoting how the non active faults below the site may be affected by large quakes on the surrounding active faults.

Response 30-6:

Seismic hazards for the site were evaluated by the project geotechnical engineers in *Geotechnical Investigations and Grading Plan Review, Tentative Tract 51122, West Bluff Property, Westchester Area, City of Los Angeles, California;* Pacific Soils Engineering, Inc., July 7, 1997, which was prepared to City standards and reviewed and approved by the City of Los Angeles Bureau of Engineering and Department of Building and Safety. Both active and inactive faults were addressed. The findings of this report are reflected in Section IV.A, Earth, of the Subsequent Draft EIR. The conclusion of the Subsequent Draft EIR is that the project site would not be exposed to geotechnical hazards beyond the level of hazard to which most southern California properties are exposed and no significant project impact would occur. With regard to potential new mapping expected in September, there is no requirement that the geotechnical analysis include new information which is not yet available. The geologic structure within the subject site and the general vicinity were addressed in detail in geotechnical report. Active and inactive faults (including the Charnock Fault) were addressed. A seismicity

analysis was conducted to predict the on-site most probable acceleration magnitude resulting from seismic activity in southern California. It was concluded that liquefaction is not anticipated to manifest itself on-site and an acceleration of 0.47g may be used in the design of the proposed structures.

Comment 30-7:

7. Page 17 Item 4.c.2 Ground water is a significant factor in the safety of the project. No consideration has been made on the ground water effects during seasons of high rainfall.

Response 30-7:

As stated on page 130 of the Subsequent Draft EIR, the lead agency determined in the Initial Study that impacts to groundwater were not significant. The site is located on an elevated plateau, well above groundwater sources. Ground water is very deep under the mesa itself. Groundwater is at about elevation 0 (MSL), which coincides with the bottom of the bluff itself. Groundwater is not considered to be a factor that may adversely affect the proposed development.

Comment 30-8:

8. Page 17 4.c.3 Mudflow hazard is a significant factor as concluded in the attached USGS debri flow map.

Response 30-8:

As stated in the Subsequent Draft EIR (page 131), the lead agency determination in the Initial Study that impacts related to flood hazard/mudflow were not significant. The site is located on an elevated plateau, and not located in any flooding or inundation areas. See also Response 30-5.

Comment 30-9:

9. Page 19 Item 1 Consideration must be made in the event that Playa Vista may not be built due to the Army Corp of Engineers revoking the construction permits. The Friends of the Ballona Wetlands do not have the qualifications or the funds to participate in any construction measures.

Response 30-9:

The applicant is responsible for implementation of the CDFG mitigation measure included on page 19 of the Subsequent Draft EIR regarding habitat enhancement to existing Diegan sage scrub and removal of exotic vegetation on the bluff face, whether or not the Playa Vista project is completed. Coordination with Friends of the Ballona Wetlands and planned restoration under the First Phase of Playa Vista was included in order to reduce potential conflicts and involve interested parties in the environmental process. If the Friends of the Ballona Wetlands chose to not participate, the mitigation measure would still be implemented in consultation with responsible and trustee agencies.

Comment 30-10:

10. Page 21 Item Cumulative Impact, The project's contribution to cumulative impacts is significant. This is an opinion and should not be presented as fact. Also the fate of the first Phase of the Playa Vista Project is now in question as the permits are currently revoked.

Response 30-10:

As stated on page 21 of the Subsequent Draft EIR, the proposed project's contribution to cumulative biological impacts is not considered to be significant, due to the disturbed nature and correspondingly low resource value of the project site. This conclusion was based various site surveys that were completed by qualified biologists and consultation with recognized experts. However, the comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

Please see Response 30-9 regarding the impact of the Playa Vista project on the proposed mitigation measures.

Comment 30-11:

11. Page 24 item 4.j and Page C5 of the Appendices. Risk of upset to human health is significant due to possible explosion from migration of natural gas from underground storage wells and inadequate data regarding landslides and hidden blind thrust faults. The inclusion of Spatially-representative near site faults as a basis for possible hazards is not sufficient for the probabilistic assessments of earthquake damage to the project.

New hazard maps for the Venice Quadrangle will be ready to include in the final EIR as of September 98.

Response 30-11:

As stated in the Subsequent Draft EIR, there are no hazardous materials on or adjacent to the project site, and therefore, no significant impacts are anticipated with regard to risk of upset/ human health. This issue was eliminated as part of the Initial Study. It is unclear what the commentor is referring to regarding underground storage wells. However, it is assumed that the commentor is referencing the Southern California Gas facility located near the Del Rey Hills area adjacent to the Playa Vista site. Please see Response 15-5 regarding the issue of safety with respect to natural gas.

The potential for mudflows or landslide hazards to people, property or infrastructure would be reduced to a level of insignificance with adherence to all City design review, permitting and construction inspection procedures, and therefore, impacts would be less than significant (page 80 of the Subsequent Draft EIR). See also Response 30-6 regarding faults in the area.

Comment 30-12:

12. Page 33 item 4.o.4 Private parks for residents only will not provide adequate park areas for non residents. No mitigation is possible.

Response 30-12:

The open space/recreation areas included in the proposed project will be available to the public, not just residents of the proposed development. See the revised Project Description in Section II of this Subsequent Final EIR regarding additional acreage proposed for open space/recreation areas.

Comment 30-13:

13. Page 41 4.r Safety is a significant factor, please refer to numbers 5, 6, 7, 8, 10, and 11 of this letter. Page 30, this project cannot rely on a fire station formerly planned for the Playa Vista Project as the permits for the project have been revoked.

Response 30-13:

Please refer to Responses 30-5,-6,-7,-8,-10, and-11 regarding safety issues associated with the proposed project.

The reference to mitigation included as part of the Playa Vista First Phase (new fire station) was in reference to cumulative issues. As the Playa Vista project has been approved, it was correct in including it as part of the cumulative analysis. If the Playa Vista project is not developed, it is anticipated that the corresponding cumulative impacts of that project with regard to fire protection services would likewise not occur. No change in the Subsequent Draft EIR conclusion would be warranted. Further, as stated in the Subsequent Draft EIR (page 28), no significant project-related impacts would occur with regard to fire protection services.

Comment 30-14:

14. Page 43 Cumulative Impact, the use of the phrase "evolving developed urban nature of the project locale" is an opinion, partially based on the assumption that Playa Vista would be built This [*sic*] is in question as Playa's permits have been revoked. Additionally the trend is now toward preserving remaining eco-systems and not destroying them.

Response 30-14:

The characterization of the "evolving developed urban nature ..." of the project area is based on the project site's General Plan and zoning designations, as defined in Section IV.H, Land Use, of the Subsequent Draft EIR as well as the presence of related projects that have been proposed or approved in the project area, as stated in Section III.B, Related Projects, of the Subsequent Draft EIR. While there is legal controversy relating the revocation of a Section 404 (Clean Water Act) permit granted to Playa Vista, only that permit addressing impacts to federally designated wetlands has been revoked. Construction of Playa Vista Phase I has not been halted outside of those areas subject to the Section 404 permit in question. Furthermore, CEQA requires that as an "approved" project such as Playa Vista Phase I must be considered in the cumulative impact analysis.

The comment regarding ecosystem preservation is noted and will be forwarded to the decision makers reviewing the project proposal.

Comment 30-15:

15. Page 47 item 4.t.2 Paleontological mitigation's are not acceptable or possible to preserve the sites integrity. The term "likely to encounter" regarding the construction is ambiguous and without merit. No project can be built while preserving these valuable resources for the people of this state. The anticipation that impacts to Paleontological resources are not significant is in error.

Response 30-15:

Use of the term "likely to encounter" is appropriate given the presence of Palos Verdes Sands and previously recorded fossil-bearing rock formations within the project site, as discussed in Section IV.T.2, Paleontological Resources, of the Subsequent Draft EIR. Since there is no certainty that fossils would be found, the presence of a qualified paleontologist to monitor construction sites during the grading phase to ensure that potentially exposed fossils would not be destroyed is an accepted professional practice and is a required mitigation for the proposed project.

The threshold for impact significance to paleontological resources, as stated in Section IV.T.2, Paleontological Resources, of the Subsequent Draft EIR, is the destruction of fossils through excavation in areas where rock units with a history of producing numerous fossils are likely to encountered. Monitoring of the site during the grading phase of construction, and, if necessary, removal of fossils by a qualified paleontologist, is intended to insure that such destruction would not occur as the result of project implementation. After mitigation, the impacts to paleontological resources were determined to be below the threshold for significance.

Comment 30-16:

16. Page 59 #2 The changes in regulations and plans does not account for new seismic or hazard data generated by the Ca. [*sic*] Dept of Mines and Geology.

Response 30-16:

As stated in the Subsequent Draft EIR (page 90), the proposed project would be developed consistent with established design and construction standards, as delineated in state, county, and City seismic building and development codes that are in place at the time of construction.

These codes are designed to reduce seismic risks to acceptable levels. Therefore, no significant impacts would be expected. Please see Response 15-5 regarding new information on seismic data.

Comment 30-17:

In general, the report claims that Hastings Canyon is not a significant natural feature and is a result of urban runoff. Early USGS maps clearly show the canyon existing before urban development. As is the nature of similar topographic features the canyon may be underlain by a fault. It is a natural streambed and contributes to the health of the entire eco-system of which it is an important part. To imply that the sediment from the canyon will adversely affect the wetland below is not based in fact or science.

Response 30-17:

The project geotechnical consultant states that Hastings Canyon has developed as a result of runoff (urban or otherwise) flowing off the bluff-top or mesa area down to the wetlands below. Project biological consultants indicate that filling Hastings Canyon will reduce sediment entering the wetlands below, and this is cited as a beneficial effect (see Section IV.D, Plant and Animal Life, of the Subsequent Draft EIR). See also Response 30-6, which states that no significant seismic impacts are anticipated for the project. However, the commentor's opinions will be forwarded to the decision makers for their review and consideration.

LETTER NO. 31
Signed by: Patricia and Franklin Dey

July 8, 1998

7432 W. 80th Street
LA, CA 90045

Comment 31-1:

My husband and I are long time residents (22 years) of West 80th Street and live directly across the street from the proposed West Bluffs development. We are very concerned about this development since we are the ones most impacted. Our most desirable alternative would be to restore both the bluff and top of the bluff face to a state approximating its original condition and leaving it as valuable open space. It would be of great benefit to the newly created 34 acre freshwater marsh of the Ballona Wetlands. Barring this development please note some of our concerns:

Coastal Bluffs Specific Plan which purposes:

- To protect, maintain, enhance its natural resources.
- To prepare specific development and environmental regulations. [*sic*] tailored to the particular conditions and circumstances of the Playa del Rey Bluffs.
- To regulate all development: **height, density, bulk and other factors in order to provide for the protection and enhancement of views of scenic features visible from scenic corridors and scenic highways, and to assure that development is compatible and in character** with **the existing community.**
- To preserve and protect the unique and distinctive land forms by developing **sensitive** site design and landscaping.
- To assure the development in areas adjacent to environmentally sensitive habitat areas are sited and designed to prevent impacts which would significantly degrade such areas.
- To implement the policies and objectives of the scenic highways Plan.

Response 31-1:

To clarify the commentor's paraphrasing of the Coastal Bluffs Specific Plan policies, the policies are reprinted as they appear in Section IV.H, Land Use, of the Subsequent Draft EIR on pages 185 and 187.

The purposes of the Coastal Bluffs Specific Plan are as follows:

- To implement the policies and objectives of the Scenic Highways Plan, the Seismic Safety Plan, the Open Space Plan, the Conservation Element and the Westchester/ Playa del Rey Community Plan, which are portions of the General Plan of the City of Los Angeles.

- To protect, maintain, enhance and where feasible, restore the overall quality of the coastal environment and its natural and cultural resources.

- To assure that maximum public access to the coast and public recreation area is provided.

- To prepare specific development and environmental regulations tailored to the particular conditions and circumstances of the Playa del Rey Bluffs consistent with the general policies of the adopted Los Angeles General Plan and the Westchester/Playa del Rey Community Plan.

- To regulate all development, including use, height, density, bulk and other factors in order to provide for the protection and enhancement of views of scenic features visible from scenic corridors and scenic highways, and to assure that development is compatible and in character with the existing community.

- To control erosion by increasing groundwater recharge, and reducing water run-off.

- To preserve and protect the unique and distinctive land forms within the Specific Plan area by requiring sensitive site design.

- To assure that development in areas adjacent to environmentally sensitive habitat areas are sited and designed to prevent impacts which would significantly degrade such areas, and to be compatible with the continuation of such habitat areas.

- To reduce potential adverse effects of grading in hillside areas and to prevent or reduce significant erosion, geologic instability or destruction of the surrounding area.

- To minimize the impact of commercial and industrial development adjacent to residential neighborhoods.
- To preserve neighborhood commercially planned areas consistent with the Westchester/Playa del Rey Community Plan.
- To reflect current city planning goals, urban design standards.

Comment 31-2:

Objectives of the Scenic Highways Plan

- Maximizes views form public ways, and provides access to enjoyable scenic resources
- To provide for the protection and enhancement of views of scenic features ..... within or visible from scenic corridors

Response 31-2:

To clarify the objectives of the Scenic Highways Plan, as paraphrased by the commentor, the objectives are included below as they appear in Section IV.H, Land Use, of the Subsequent Draft EIR (pages 189-190). In addition, the corridor development criteria (from page 190 of the same Section) are also included below.

The Scenic Highways Plan has the following objectives: to preserve and enhance existing scenic resources and to develop potential scenic resources; to create a coordinated and integrated system of scenic highways and corridors that strengthens the city's image, maximizes views from public ways, and provides access to enjoyable scenic resources; to provide for the protection and enhancement of views of scenic features within or visible from scenic corridors; to provide for the consideration of aesthetics and scenic preservation and enhancement in the design and maintenance of scenic highways; and to promote concern for the city's visual environment in public and private decision-making. A scenic corridor is defined as "the land area visible from, and normally contiguous to, a Scenic Highway which can be realistically subjected to protective land use controls. Minimally, it will incorporate the Scenic Highway itself and the adjacent lots but may extend to the line of sight."

The corridor development criteria applicable to the proposed project site are as follows:

- Earthwork: Grading of new cuts or fills should be minimized. Grading at the time of initial construction should be such that landscaped cuts and fills will not have to be disturbed again. All grading shall be contoured to blend with the surrounding terrain. Angular cuts and fills should be avoided.

- Planting and Landscaping: Fire resistant native-type plants and trees and other compatible materials for planting and screening should be utilized to preserve and enhance the natural or scenic character of the scenic corridor, especially in mountain areas. Irrigation should be utilized as necessary to sustain plant life. Existing vegetation should be preserved where not contrary to fire protection needs. Outstanding specimens of existing trees and plants should be retained and/or planted where practicable. Low-growing ground cover should be used where necessary to avoid blocking a desirable view. Taller vegetation should be used to screen objectionable views. In undeveloped areas little additional landscaping may be required.

- Enhancing Views: Selective clearing and thinning should be done to enhance or reveal desirable views. In occasional instances, topographic features may be removed or otherwise altered but only to the extent that other scenic resources are not damaged.

Comment 31-3:

The intent of the California Coastal Act

- The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance.

- Permitted development shall be **sited and designed to protect views to and along the ocean and scenic coastal areas** and to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas...

Looking at the development in light of the above regulations, this plan doesn't fulfill the spirit of the legislation, let alone the letter of the law. The West Bluffs Development overlooks the Ballona wetlands, Marina del Rey, the Santa Monica Bay, and the Pacific Ocean. Each of these areas is a 'jewel' of our Southern California landscape and should be shared by all.

Response 31-3:

To clarify the commentor's paraphrasing of those policies of the California Coastal Act which may be applicable to the portion of the proposed project located within the Coastal Zone, the policies are included below as they appear in Section IV.H, Land Use, of the Subsequent Draft EIR.

- (Section 30211) Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

- (Section 30240) (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas; and (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.

- (Section 30244) (a) Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.

- (Section 30251) The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degrade areas. New development in highly scenic areas such as those designed in the California Coastline Preservation and Recreation Plan prepared by the Department of Park and Recreation and by local government shall be subordinate to the character of its setting.

- (Section 30253) New development shall: ...(2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

Section IV.H, Land Use, of the Subsequent Draft EIR, discusses potential land use impacts associated with implementation of the proposed project. The land use analysis concludes that

the proposed project would be consistent with applicable policies of the Coastal Bluffs Specific Plan and the City's Scenic Highways Plan. The project was also determined to be consistent with applicable Coastal Act policies governing land use on the project site. With regard to project impacts on available views, analysis led to the determination that while significant view impacts would occur from some vantages, after taking into consideration the increased setback distance of residences from the bluff edge and the new public view opportunities which would be created by the proposed view park and pedestrian trail, project implementation would be in compliance with applicable Coastal Act policies governing view resources.

Comment 31-4:

We think that more should be done with the buildings and lots of 80th-Rayford Street to minimize the negative impacts associated with the **loss of views.** This could be accomplished by having greater side yards, architectural design to allow view opportunities from second floors, and/or smaller building square footage on the same size lots. This would be more in line with the spirit and letter of the applicable laws and help to mitigate the negative impacts and losses to the whole community.

EIR states '...the project would inhibit views extending beyond the project site to the Santa Monica Bay and the mountains which are unique and not readily available elsewhere.' We agree that something should be done to protect the publics [*sic*] right to this outstanding view and not make if **only available** to the few millionaires who can afford the blufftop homes. This is the reason the Coastal Act was passed by California.

Response 31-4:

A revised Tentative Tract Map (No. 51122) for the project site was submitted to the City Planning Department in October of 1998. The revised map eliminated two residential lots on the project's 80th Street/Rayford Drive frontage, reducing the total number of proposed residences in this portion of the project site from 31 to 29. As a result of elimination of two residential lots, the two adjacent open space lots (Lots 127 and 128) were widened to a minimum of 100 feet. Additionally, 22 of the 29 residential lots are wider than the minimum required width (58 feet) in order to accommodate the proposed homes and the minimum required side yard setbacks.

The proposed open space Lots 120, 122, 125, 127, 128, and 130 together with the proposed internal street system, are all intended to increase public access to the bluff top areas where

views off-site are available. This access does not exist now because the property is private and largely fenced. The Hastings Avenue and the Veragua Walk rights-of-way are not improved inside project boundaries and therefore do not represent usable public access.

Proposed development of residential lots and homes within the project site is confined to the bluff top. This bluff top is located within Subarea 2 of the City of Los Angeles Coastal Bluffs Specific Plan. Subarea 2 regulations in the Specific Plan do not contain any additional zoning standards beyond the site's R1-1 zoning designation. The bluff tops is also almost entirely outside the Coastal Zone boundary.

Comment 31-5:

At a meeting with Ruth Galanter's neighborhood advisory group the developers showed their plan overlaid on an actual photograph of the existing property. This showed how much needed to be filled on the bluff (at the narrowest portion of the property) to develop lots 1 through 5. The developer has stated many times (I couldn't find In the EIR) that there would be **at least a 65' setback** along the top of the bluff. I understand that when the blufftop is lowered there will be more depth in the property but how far is the bluff being lowered? At present, there is only about 300' at the narrowest portion of the development. After development:

Lot #2 depth	110',
'B' Street	60'
Elevation change	~15'
Lot #92 depth	150'
Enlarge 80th Street & add Parkway on the North side . . .	~15'

This adds up to 350' plus a 65' setback equals 415'. How much is the bluff being lowered to pick up 115 feet?

Response 31-5:

Through the narrowest portion of the proposed development in a north-south direction, generally through proposed Lots 2 and 92, the site is mostly proposed to be cut down (lowered), not filled. Over proposed "B" Street, between Lots 2 and 92, the site is proposed to be cut down as much as 25 feet. The front portion of Lot 2 would involve a cut of approximately 21 feet. The rear lot line of Lot 2 would be approximately at existing grade (140 feet in elevation) approximately 15 feet down the existing bluff face. A small fill would

be located north of Lot 2 at the proposed top of the bluff, in the area of the proposed bluff top drainage bench/walkway. This fill would be behind a small retaining wall (pile supported) within an existing erosional feature at a maximum depth of approximately 5 feet. Proposed Lots 1-7 are also in a proposed cut situation similar to Lot 2.

The setback from the proposed bluff edge to the home that would be built on Lot 2 would be approximately 45 feet (including the required 15 foot plus required rear yard building setback on Lot 2). This will most likely be the shortest setback between the bluff edge and proposed homes on Lots 1 through 27. The average setback in this area will be at least 65 feet. Page 354 of the Subsequent Draft EIR notes that the setback for these lots (not including the building setback on the lots) would vary from approximately 30 to 75 feet.

The total depth of development area in this portion of the project (from the 80th Street right-of-way to the proposed bluff edge, through Lot 92, "B" Street, Lot 2 and the bluff top bench/ setback area) would be approximately 352 feet. Lowering the project site as described above is necessary in order to allow "A" Street to connect from Lincoln Boulevard without exceeding a 15 percent grade and to allow the project site to drain to the proposed storm drain to Lincoln Boulevard.

Comment 31-6:

It is also interesting to note here that The Friends of Ballona Wetlands "... recommend a setback of at least 100 feet from the edge of the bluff. This would ease the burden on the bluff and leave at least some of the native vegetation and bluff structure alone." I think they might not realize how much is being cut on the bluff edge.

We agree with the position of Friends of Ballona Wetlands "...the small amount of space dedicated for public use by the proposal is not adequate. If the development is permitted, a requirement for **more dedicated open space** should be administered." Recent property developments over the last few years has added over 230 homes with more to come and no open space was provided to our community. Section 17.12 of the city code requires 2.1 acres of Park & Recreation Space should be provided to the community and we would definitely prefer the Park & Rec. space and not moneys given to the Quimby Fund. There is also the matter of Hastings Avenue and Veragua walk (~.8 acres), both public rights of way, we feel these should be traded for additional Park & Rec. space within the development.

Response 31-6:

Proposed Lots 1 through 27 are setback from the proposed bluff edge approximately 30 to 75 feet. Including the minimum required rear yard setback (15 feet) on these lots, the total setback between the bluff edge and proposed homes on these lots would vary from approximately 45 to 90 feet. The back edge of Lots 1 though 27 on the revised tract map differ in proposed elevation from existing grade between two feet lower (Lots 11, 12, and 13) and 20 feet lower (Lot 1).

Please see Response 13-7 regarding required open space and mitigation.

In response to community concerns regarding abandoning the existing Veragua Walk and Hastings Avenue right-of-way on the project site (totals 0.8 acres), the project proposes to dedicate and improve 6.29 acres of public streets with sidewalks. In addition, the project proposes to dedicate over 2,500 linear feet of public walkway outside of the street right-of-ways as compared to the 110 linear feet of existing Veragua Walk right-of-way on the project site. The existing Hastings Avenue and Veragua Walk right-of-way on the project site has never received any improvement for public use.

Comment 31-7:

As I'm sure you are aware traffic problems exist along West 80th Street. The EIR (p. 253) indicates the project impact for traffic volume on 80th Street to be 8.35% which is below the City's DOT level of significance of 12%. Our study showed that of the 310 car trips generated by the new homes on 80th Street 75% or 233 car trips would be added to the existing volume of cars on 80th street. This represents a 19% increase in traffic volume which does exceed the City's threshold (l2%). This fact in addition to the cumulative impact from future residential development in the area mandates that mitigation measures be developed to deal with this problem.

Response 31-7:

The commentor does not indicate how this determination of project impacts to 80th Street was arrived at, nor the data and assumptions used. It is important to note that many of the vehicles resulting from the proposed 28 homes fronting 80th Street have direct and/or convenient access to the north/south streets accessing 83rd Street or Manchester Avenue. Many vehicles, including those from the existing residential developments, could use these routes. The

measures proposed as part of Phase I of the Neighborhood Traffic Intrusion Program (NTIP) also include two traffic circles and additional stop signs on 80th Street, to further deter excessive travel on 80th Street, and encourage the use of the north/south travel routes (Hastings Avenue, Park Hill Drive, and, to the west, Berger Avenue, Hulbert Avenue and Zayanta Drive/Saran Drive) and other area streets. The NTIP encourages a more equitable utilization of all area residential streets.

Comment 31-8:

We strongly support the use of a construction relations officer as suggested on p. 14 of the EIR to act as a community liaison concerning on-site construction activity, including resolution of issues related to fugitive dust control. The opportunity to contact this officer should be on a 24-hour basis.

Response 31-8:

The commentor's statement of agreement with the mitigation measure is noted. As construction activities would be limited to the hours of 7:00 A.M.-6:00 P.M. Monday-Friday and 8:00 A.M.-6:00 P.M. on Saturdays as required by City Ordinances, there would be ample opportunity to contact the construction relations officer during construction hours regarding resolution of any issues. However, the project applicant would provide a 24-hour hotline during construction, as described in the Applicant's Required Construction Practices for the West Bluffs Project (see Section II, Corrections and Additions to the Subsequent Draft EIR and Appendix B of this Subsequent Final EIR).

Comment 31-9:

In the EIR **grading** discussion, the developer appears to be raising some building pads perhaps as much as 15 feet or more. [*sic*] this has a very negative Impact on potential view corridors. We do realize this is being done to maximize the number of view homes, but in doing so it is taking away the mountain views enjoyed by everyone who lives in the community. We believe that the maximum height of all homes in the development should be limited the 30 feet with CC&Rs to inhibit someone in the future from remodeling and going 45 feet. The heights of our homes on the south side of 80th are governed the 'Big House Ordinance' and the homes in the development are not. This means they can build to 45' and we are limited to 33'. To compensate for our loss of view, 80th, 81st, and Rayford Streets should be granted a variance to allow us to build to a height of 45 feet.

Response 31-9:

In response to public comments, a mitigation measure has been added to limit the height of homes built on the project site to 35 feet (see Section II, Corrections and Additions to the Subsequent Draft EIR).

The granting of variances, as possible mitigation, is beyond the scope of this EIR. The commentor is directed to the City Planning Department to pursue the issue of obtaining a height variance for the commentor's property.

Comment 31-10:

The instability of Hastings Canyon is of great concern to us. If the city allows the filling and building on this canyon and there is slippage or settling, as with Potrero Canyon in Pacific Palisades, the State of California, the California Coastal Commission, the City of Los Angeles (which means you and I the taxpayers) will pay for the problem not the developers. What is happening right now in Malibu on the Pacific Coast Highway should make everyone review carefully mans [*sic*] ability to control consistent, severe and very natural erosion. How restoration will prevent further erosion needs to be better explained and perhaps more effective erosion controls will be needed. Otherwise the City again will be party to an unwanted lawsuit by homeowners whose backyards or houses are in the beautiful Ballona Wetlands.

Please consider this development carefully it is the last open bluff. And as stated by Nelson Rising, CEO of Catellus "Not every piece of land should be developed--it's as simple as that."

Thank you for considering this letter. If you have any questions, I can be reached at (310) 393-0411 ext. 6666.

Response 31-10:

The filling of Hastings Canyon and the diversion of drainage run-off from this area will eliminate this canyon as an erosional feature in the area. Current drainage from the area above the bluff will no longer flow down this canyon, instead along with future drainage it will be diverted into new storm drains and taken away from the bluff and canyon. Even with diversion of drainage away from the canyon, if it was not filled it would still experience erosion from precipitation directly on the canyon, and natural weathering and sloughing of the canyon walls.

Filling the canyon eliminates all together the possibility of the canyon eroding and threatening existing and future homes in the area. The canyon will first be prepared prior to filling with the removal of unstable soils and placement of subdrains to carry away any subterranean drainage that may occur. The fill will be compacted as it is placed in the canyon pursuant to the approved soils report. Terrace and down drains will be designed into the exposed slope face of the fill to carry away any drainage resulting from irrigation or precipitation directly on the slope face and prevent erosion. Finally, landscaping of the slope face of the fill will further prevent erosion.

Thus, the proposed development will result in the control and redirection of storm water run-off via storm drains away from the top of the slopes, greatly reducing erosion. To fill Hasting Canyon, the existing loose deposits at the bottom of the canyon will be removed and the sides of the canyon will be laid back prior to the placement of compacted fill earth. The project grading plans and geotechnical reports for the project site, including Hastings Canyon, have been reviewed and approved by the City of Los Angeles Bureau of Engineering and Department of Building and Safety. Design measures which are provided in these reports would reduce erosion over current conditions, and have been approved by the City of Los Angeles Bureau of Engineering and Department of Building and Safety to mitigate any potential erosion or slope stability problems. See also Response 24-2.

The commentor's concern regarding development of the bluffs is acknowledged and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 32
Signed by: Craig S. Eggers

July 6, 1998

7813 West 83rd Street
Playa del Rey, CA 90293-7920

Subject: West Bluffs Project, Subsequent Draft Environmental Impact Report, EIR No. 91-0675, State Clearinghouse No. 92014046

Comment 32-1:

I am pleased to submit my response to the Environmental Impact Report No. 91-0675.

I have lived in the Westchester/Playa del Rey area for over 15 years and been a resident of Playa del Rey for the last 10 years. I am also an active member of the West Bluffs Steering Committee (WBSC).

My family and I have observed a dramatic growth in our community. Unfortunately along with this growth has come increased traffic on the surrounding streets and over crowding in our local parks. Over the years local residents have enjoyed open space in the form of vacant lots previously (or currently) owned by Hughes Corporation and The Southern California Gas Company. This space has been consistently used for park & recreation area as well as for enjoying panoramic views of the Pacific Ocean, Marina del Rey, the Santa Monica Mountains and the LA Basin.

Please know I am not against the development, but feel strongly that the developer has a responsibility to the existing community to help us maintain the park like open space, bluff access and view/overlook amenities we are accustomed to enjoying in our neighborhood. Specifically, a continuous Pedestrian Trail extending around he [*sic*] bluff edge remains as my only concern.

If the developer and the City can recognize the value to the community of this remaining request, I will personally employ my influence to actively support the development as it moves forward. I sincerely appreciate the concessions and compromises that have been achieved

between the developer and the community to date and anticipate inclusion of the Pedestrian Trail along with the previously agreed to concessions (see attached Exhibit One).

Please review this document for specific inclusion in the final EIR document. If you have any questions please call me at my office at (310) 822-5351.

I look forward to hearing from you in the near future.

Response 32-1:

See the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, regarding modifications to the pedestrian trail and open space areas. The commentor's position is acknowledged and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

Comment 32-2:

Exhibit One-Attached

Response 32-2:

The attachment to this letter is the same as that attached to Letter No. 14 from the West Bluffs Steering Committee. See Responses 14-2 through 14-18.

LETTER NO. 33
Signed by: Alan C. Engebretsen

8220 Rayford Drive
Los Angeles, California 90045-2428

Comment 33-1:

Regarding the proposed Ballona Westbluff development in West Westchester, Los Angeles, California:

I am opposed. As a resident at the above address since 1977, I have come to know the area of the proposed development, and can attest to a great variety of plant and birdlife which would be threatened by the proposed development on the site.

120 homes would alter the character of the surrounding neighborhood irrevocably. Traffic to and from the 120 homes would add hydrocarbons to the air, and degrade that air quality.

The acerage [*sic*] involved is important to the integrity and operation, if you will, of the Pacific Flyway for birdlife on the coast of California.

Response 33-1:

It was recognized in the Subsequent Draft EIR that significant air quality impacts would occur during project construction. However, these impacts would be temporary and would cease after construction. No significant air quality impacts are anticipated with project operations. In addition, no significant plant and animal life impacts would be associated with the proposed project. However, this comment will be referred to the decision makers for consideration in reviewing the project proposal.

LETTER NO. 34
Signed by: Rex Frankel

July 6, 1998

6038 W. 75th St.
Los Angeles, CA 90045

Comment 34-1:

You have been asked to consider issuing development permits for the Catellus Corporation's West Bluff housing development. This 44 acre coastal bluff connects directly to the very fragile Ballona Wetlands, and contains a vernal pool, coastal prairie, riparian canyon and 2 Native American village sites. I urge you to deny issuance of these permits based on the faulty, inadequate and biased Draft Environmental Impact Report.

Response 34-1:

This comment has been noted for the record and will be forwarded to the decision makers for their consideration. Please refer to Response 15-9 for discussion of the absence of vernal pools from the project site, and Response 15-2 regarding the significance of the archaeological sites. With regard to habitat present on the bluff top and Hastings Canyon, please refer to Responses 13-1, 22-13, 24-1 and 30-1.

Comment 34-2:

Traffic: the sole benefit to the surrounding neighborhoods is the offer of $350,000 in stop signs and speed bumps and a few traffic barriers. This is minuscule [*sic*] compensation for the huge profits which Catellus will reap from building 120 homes, compared to the loss of this bluff top and coastal canyon, and coastal access, wildlife and views by the public and adjacent homeowners. But most glaring is the way nearby residents have been manipulated by Nelson Rising's Catellus Corp. bait and switch sales pitch, into believing that there will be no cut-through created in the project, allowing traffic to get from Lincoln Blvd. to Manchester. Catellus says the access from 79th St. will be for emergency use only. But Rising made promises for his last project, Playa Vista's phase 1, which the City Council let him back out of, when the project came up for final approval. I suspect the city's fire dept. will demand that the 79th St. access be opened permanently, and any neighbors who have been lured into supporting

the project on this basis will have been lured into complacency, by this bait-and-switch strategy.

Response 34-2:

The proposed 79th Street emergency access will be appropriately covenanted and conditioned so as to guarantee its use for emergency access only. It will not be opened as a permanent route. The Los Angeles Fire Department has reviewed the project's proposed access, and does not voice the concerns indicated by the commentor. See Response 9-1.

Comment 34-3:

Biological resources: I disagree with the conclusion of the developer's consultants that the project site "contains very low habitat resource values" (page 140), and "There is little wildlfie [*sic*] utilization of the project site" (page 151) [*sic*] Despite that they admit 67 species of birds, mammals and reptiles use the site, the developer's consultants can't seem to find protected species such as burrowing owls, even though nearby residents have seen them for years; even though biologists who don't work for the developer have seen them, along with endangered peregrine falcons; even though the EIR says that red foxes on the site are "likely to contribute to the ereadication [*sic*] of ... some bird species (e.g. burrowing owl)" (page 140). Obviously, rare birds are using the bluff top as habitat and foraging area, but the biased consultants working for Catellus can't seem to see them.

Response 34-3:

Please refer to Responses 13-3 and 13-5 for discussion of the presence of raptors and other birds on the project site. With regard to determinations about resource values on the project site, please refer to Responses 1-3, 13-11 and 27-4.

Focused surveys for the burrowing owl turned up no evidence of this species. While past colonization of the property by the owl may have occurred, the species is no longer present on-site, as a probable result of the forces cited in Section IV.D, Plant Life and Animal Life, of the Subsequent Draft EIR, and therefore project implementation would not impact the species. Speculative or known past or anticipated future use of the project site by a species is beyond the scope of this EIR to address; please refer to Response 13-18 for discussion of the required scope of EIR analysis of environmental issues including biological resources, per the California Environmental Quality Act (CEQA).

Comment 34-4:

The EIR consultants claim on page 136 that "the bluff top field ... predominantly supports wild radish and other weed species, with a sparse, seasonal non-native grass understory. "[*sic*] This observation is false and biased in the developer's favor. While non-natives such as radish grow taller than the natives, they die down quicker, revealing the natives which flourish underneath. Actually, the bluff top has a strong native understory of dove lupine and annual deerweed, California suncup (cammissonia bistorta), datura, douglas' nightshade, plenty of coastal sage (artemisia Californica), cliff aster, turkey mullein, bedstraw, and cuddy leaf aster on the bluff top. The Catellus Corporations [*sic*] consultants are biased in favor of the development and have used very questionable science to justify their findings. The landowners have also annually disced the bluff top, allegedly for "weed abatement", so by the time you receive this letter, most of the annual bluff top plants will have been plowed under until next spring. I have a videotape of all these plants which I found, taped on June 20 1998, which I can duplicate for you.

Response 34-4:

The species cited by the commentor represent species commonly found in native or non-native grasslands, grassland understories of shrublands or in wildflower fields, which would not be unexpected even in a area previously graded or disked but presently overrun with ruderal species; viable seed banks survive for undefined durations in soil awaiting conditions that promote germination. While disking favors aggressive introduced species that can survive under highly disturbed conditions, native species may persist, albeit in reduced numbers or diversity. None of the species are sensitive and all could be expected to persist in bluff slope habitat, which would be preserved as part of the proposed project.

Comment 34-5:

The consultants also claim Hastings Canyon isn't worth preserving. In fact, the bottom of the canyon is a publicly owned, but inaccessible to cars street [*sic*] easement, therefore not owned by the developer. The canyon contains willows, mulefat, coastal sage and california [*sic*] suncup, which are native wetland and upland plants, plus the consultants can't seem to find the caterpillar phacelia plants, which I have current photos of, which are the host plant for the "sensitive" Henne's eucosman moth. The plants are located on the east side of the mouth of the canyon at Cabora Road, and are hard to miss; unless one is a biased consultant for the developer, that is.

Response 34-5:

Please refer to 22-3 for discussion of the habitat value of resources in Hastings Canyon. Planning Consultants Research (PCR) biologists did observe and note the presence of wetland and riparian plant species in the canyon, but their presence was attributed to the presence of urban "nuisance" runoff, in turn impounded by emplaced concrete check dams in the bottom of the canyon. Nonetheless, because of the presence of the three wetland parameters required by the US Army Corps of Engineers (Corps) to assert jurisdiction, including hydric soils, hydrophytic vegetation and evidence of flowing water, even if periodic, the Corps did assert jurisdiction and recognized 0.04 acres of wetland in this area. As the resource values of this wetland was determined to be quite low, and dependent on artificial conditions (nuisance runoff and dams), so-called "out-of-kind" mitigation in the form of upland bluff slope restoration was accordingly required. The California Department of Fish and Game (CDFG) also asserted jurisdiction over a portion of Hastings Canyon and specified upland habitat as mitigation for project impacts; the mitigation measure proposed is considered adequate compliance with both agencies' requirements.

While caterpillar phacelia (*Phacelia ramosissima*), the host plant for Henne's eucosman moth (*Eucosma hennei*), was not observed on-site during the most recent surveys (1997), it was acknowledged by PCR biologists that the potential for future recolonization of the plant existed. In any event, the plant was located east of the mouth of Hastings Canyon along the bluff slopes, which are proposed for preservation, and so would not be impacted by project implementation. Moreover, the moth was never observed in proximity to the plant, although surveys were not undertaken due to the difficulty of doing so without destruction of the plant itself, and conclusive evidence of host plant utilization by the moth has not been provided. Moreover, the species, while sensitive, is not formally listed or protected and potential project impacts would not be considered significant.

Comment 34-6:

Wetland resources: Here the developer's consultants trip over their denials. The say "it [*sic*] is concluded that no evidence of vernal pools exists on-site." (page 137). They also claim, in an April 23 [*sic*] 1998 letter to the Army Corps of Engineers (contained in the biological resources appendix), that they found "no topographic depressions or indicator plant species characteristic of vernal pools." This is absolutely wrong. I have photographs of these pools from 1995 and 1998 that shows the exact opposite. The geology of the El Segundo sand dunes system, which the West Bluff is a part of, is notorious for encouraging the formation of vernal

pools, due to the alternating layers of sand and clay. The clay traps rainwater keeping it from percolating to the sea level water table in the area. So vernal pools are a natural occurrence [*sic*] throughout the area. Also, I videotaped the vernal pool area on June 20, 1998 with an expert on the coastal prairie habitat who worked extensively on the restoration of the LAX Airport Dunes west of Pershing Drive, and despite some taller non-native species like wild radish covering the area, the vernal pool site had a dense, strong understory of dove lupine (lupinus bicolor) and annual deerweed, both of which are native vernal pool plants.

Response 34-6:

For specific discussion of the absence of vernal pools from the project site, please refer to Responses 15-9 and 27-1. The topographic depression described by the commentor was noted by PCR biologists and the Corps field investigator during field surveys. See Section II, Corrections and Additions to the Subsequent Draft EIR. However, the area was determined not to contain or represent a vernal pool at this time. No evidence of clay hardpan was observed by the project geotechnical engineer or PCR biologists, the latter of whom took soil samples in the area of the depression specifically to ascertain whether such a soil horizon existed. Nonetheless, even in the event that a local hardpan lens supports the accumulation of surface water, this represents only a "ponding" of water and not a vernal pool without the defining vernal pool plant or wildlife species (fairy shrimp). Both the dove lupine and deerweed species cited by the commentor are strictly upland species and are not recognized as vernal pool indicator species.

Comment 34-7:

The EIR further contains evidence of the existence of this vernal pool. On page 118, it says "The existing site has a large sump that overflows onto Hastings Avenue...". A sump is the same as a vernal pool. There is also a map on page 77 which shows the basin which fills up with winter and spring rains. And then on page 16 of the archeological appendix report, dated November 1997, it is stated "Van Horn argued that these depressions may have supported "vernal" ponds, or seasonal waterholes that collect winter rains and last into spring. These ponds would have attracted waterfowl and small animals, which in turn would have attracted human settlement .... This pattern of use lasted thousands of years."

Response 34-7:

Please refer to Responses 15-9 and 27-1 for discussion of vernal pool absence from the project site. A sump is not the same as a vernal pool. A sump is a low area which receives drainage and this is the meaning employed by the project hydrologist in referring to this area of the project site in Section IV.C, Surface Water Runoff/Hydrology. In the case of the project site, the so-called sump is an accumulation or ponding of water. A vernal pool, according to the legal definition (in turn based in biological criteria) employed by the Corps, the primary agency with regulatory authority over vernal pools, is defined by the presence of vernal pool vegetation, as well as topography and an impermeable soil layer that prevents downward percolation of water. In addition to the Corps, the US Fish and Wildlife Service has jurisdiction over vernal pools when designated vernal pool species are found to be present. The presence of vernal pool vegetation is an indication of a certain lengthy duration of inundation that distinguishes vernal pools from mere temporary ponding of water.

Comment 34-8:

Archological [*sic*] resources: The fact that there are two Native American village sites makes this land even more significant. That the developer would grade off most of these villages sites, then strain out any artifacts to send to a museum is a desecration of an entire culture. The previous surveys of the site revealed over 45,000 artifacts (eir [*sic*] page 373) from occupation by Native Americans. I disagree with the finding that this projects impacts have been "adequately mitigated".

Please consider these concerns carefully. This blufftop site is the last of its kind in the L.A. area., [*sic*] and its loss would be irreplaceable.

Response 34-8:

The project applicant is extremely sensitive to the significance of cultural resources located on the project site. These resources were satisfactorily mitigated in the 1980's as evidenced by the fact that the property was inventoried, discovered archaeological sites were evaluated, a research design for data recovery was prepared for the significant sites and evaluated by a peer review panel, the research design was executed, and final reports were accepted by the City of Los Angeles. Even though the project archaeologists and Subsequent Draft EIR concluded that the sites were previously mitigated, the project proponent has put forth in the Subsequent Draft EIR an extensive monitoring program to ensure that any previously undiscovered unique or

important cultural feature or burial is detected and treated appropriately prior to and during construction.

Comment 34-9:

Also, please put me on the notification list for any permits which your agency is asked to issue involving this property.

Response 34-9:

The commentor's name and address (along with those of all commentors) will be added to the Department of City Planning's mailing list for notification of public hearings concerning this project.

LETTER NO. 35
Signed by: James B. Garvey

June 23, 1998

7427 W. 82nd St.
Los Angeles, CA 99045

Subject: West Bluffs Project, Subsequent Draft EIR, EIR No. 91-0675, State Clearinghouse No. 92041046

Comment 35-1:

We submit the following comments on the Subject Report.

In general we do not oppose the project and feel that with some additional restrictions, adjustments, and additional mitigation measures it will conform to both the applicable ordinances and the criteria of the majority of the residents in the adjacent neighborhoods.

We consider the following to be the most important issues with respect to the development:

> **Structure Height:** Although the zoning/building code allows a maximum height of 45 feet for single family dwellings in this area, we feel that the deeds should be restricted to a maximum of 30 feet or whatever the height is for two stories in this area. The developer has indicated that it does not intend to build over two stories, but this does not restrict subsequent buyers from increasing the height of the structure. The point from which this is measured, current grade or grade after finishing, may need to vary, based on the actual location of the dwelling and the degree to which the site was elevated as part of the development process. This is a view sensitive area, thus the restrictions are warranted. If a permanent restriction is not felt to be warranted, then a restriction until the year 2050.

Response 35-1:

A building height limit of 35 feet will be imposed by a condition of approval of the Tentative Tract Map on all project lots. A mitigation measure to this effect is added, see Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 35-2:

Open Space Areas: While the amount of open space planned in the development appears on the surface to have adequate acreage, the locations are not in the best interest of the project or the neighborhood overall and the intention seems to be that some of the open space will not be available for neighborhood use. Much of the presently allocated space is also on grades which make it unusable for other than hiking. We would propose that the open space be reviewed and areas which allow current views in all directions to be accessible to the neighborhoods in general and that lots with grades less than 10 degrees be available for general purpose use. We would also propose that some of these areas be across from the current streets which abut the project-Park Hill, Hastings, Berger, & Rayford-to provide the visual openness that the extension of the streets would do and tie the neighborhoods together visually as well as allowing recreational use and pedestrian access between the areas. There should also be some form of interior path or sidewalk that allows residents-and children in particular-on Collegio to safely access the open space areas specifically and the project in general.

Response 35-2:

Please see Responses 13-7 and 14-5 for discussion of the provision of open space and the pedestrian trial. Also see Response 7-4 regarding the design of sidewalks in the area of 81st Street and Collegio Drive.

Comment 35-3:

Park Areas: We do not believe that it is practical to provide a contiguous park area that would be large enough to meet the requirements for transfer to and management by the City of Los Angeles within this development. As the City has previously stated, smaller mini-parks tend to create unintended problems and are also probably not in the best interest of the neighborhood. We would propose that the parks requirements be allowed to be met with the provision of useable open space as described above and the provision of the hiking path along the entire bluff top as well as the path down the bluff as contained in the report. We would also propose that there not be a requirement for parking associated with the open space areas since they would be designed primarily for neighborhood use via pedestrian access. We realize that it may be in the best interest of the neighborhood to have an "air gap" in trails along the bluff to avoid possible

problems associated with a contiguous trail from Lincoln Blvd to 79th or Berger. However we would like access to the western portion from some location.

Response 35-3:

Please see Responses 14-5 and 14-6 for discussion of bluff top trails, and Response 7-9 regarding maintenance of open space areas.

Comment 35-4:

Setbacks along the Bluff. There appears to be some contradicting statements and figures in the Report with respect to the actual setback distance along the bluff itself. It is our understanding that the developer intends that there be a minimum of 45 feet between the "line of the bluff face" and the property lot. There would then be another 15 feet as the minimum setback for the structure foundation from the rear property line. Perhaps some of our confusion comes from the discussions of the areas that would be filled or repaired, thus graded to a 2:1 slope as opposed to the current natural slope. In any case, in order to minimize a variety of visual impacts as required by ordinances which apply (albeit to some portions of the face but not necessarily all) and reservation of spaces for trails, we propose that there be:

A). If the bluff face is graded to a 2:1 slope-30 feet from the point where the bluff begins to slope downward and the rear property line of the adjacent lot and the current minimum of 15 additional feet between the rear property line and the foundation for the structure. This provides for a total of at least 45 feet between the bluff face and any structure.

B). If the bluff face is steeper than a 2:1 slope-45 feet from the point where the bluff begins to slope downward and the rear property line of the adjacent lot and the current minimum of 15 additional feet between the rear property line and the foundation for the structure. This provides for a total of at least 60 feet between the bluff face and any structure.

The primary reason for the additional space for areas with a slope greater than 2:1 is safety and erosion. The recent events in Orange County and Malibu are clear indicators that ungraded slopes will continue to erode and eventually become unstable. To those of us who have traveled to areas with significant erosion, but little intrusion by man, it is

apparent that eventually soft bluffs erode and form stable configurations only when they fill to a slope in the neighborhood of 2:1 or they reach hard pack or rock which is resistant to additional erosion.

Response 35-4:

The back of proposed Lots 1 through 27 are setback from the proposed top of bluff based on a 2:1 projection up from the base of the bluff at Cabora Drive plus an additional 15 feet. In this area the bluff face is proposed to be left in a natural state. This setback for these lots will range from 30 to 75 feet with an average of over 50 feet. The City of Los Angeles Codes require an additional building setback on the lot (rear yard requirement) of another 15 feet. The City of Los Angeles geotechnical staff of the Bureau of Engineering, Department of Public Works and the Department of Building and Safety, based on analysis done by the project's geotechnical consultant, have determined that this setback is sufficient for geotechnical stability and erosion protection purposes.

The back of Lots 45 through 50 and 104 through 118 will be located at the top edge of proposed 2:1 graded slopes. Lots 45 through 50 are located on top of the proposed Hastings Canyon fill. Lots 104 through 118 are located on a combination of cut and fill slopes required for the construction of proposed "A" Street and the required widening of Lincoln Boulevard. Buildings on these lots will be setback from the rear property line a minimum of 15 feet as required by City codes. It has been determined by the project geotechnical consultant and City engineering staff that it is not necessary for the lots in these areas to be setback from the top of slope because the slope will be laid back at a 2:1 gradient, including with the incorporation into the slope of slope drains. The homes above these slopes will not project any closer to the wetlands than the homes proposed above where the bluff is to be left natural because in both instances their future location is based on a 2:1 projection or gradient.

Under natural conditions, erosion of hillsides occurs over time until an approximately 2:1-gradient slope is achieved (i.e., two horizontal feet for each vertical foot). This angle is referred to as the Angle of Repose. In order to leave the slope in as natural of a state as possible, and avoid heavily regrading (or "manufacturing") the slopes, the project has been designed to respect the Angle of Repose and provide for some mild erosion over time. The project setback for residential lots on the top of the natural bluff is based on a hypothetical 2:1-sloped plane projecting from the toe (bottom) of the bluff to the top of the bluff, and adding a minimum of 15 feet. The intention of this setback is to ensure that the structures will be located at a point well beyond the Angle of Repose for the bluff faces. To further reduce the

rate of erosion, a drainage bench is to be created at the top of the slope to intercept and redirect uncontrolled storm water run-off, and a vegetation program is to be undertaken to improve the surficial stability of the bluff.

Comment 35-5:

> **Views and Visual Environment:** In general, the Draft Report neglects a significant visual element. There are views of the Pacific Ocean from most vantages along the bluff. It is the proposed loss of these views that we feel is more important than retaining the views of the wetlands below the project and the "cityscapes" to the north and east. Like the developer, we recognize that the lots which provide the ocean views will command the highest dollar values, but we feel that the neighborhood needs to retain access to these views also. Again we propose a neighborhood accessible path along the entire top of the bluff as well as a couple of more open areas which provide westerly views of the ocean as well as the cityscapes to the north and east. We also realize that if there is to be neighborhood access between the property lots and the bluff top, the owners will need to be allowed to have some form of protection. We would not oppose either open type fences (as opposed to solid wall) up to 5 or 6 feet or some form of dense shrubbery.

Response 35-5:

The proposed project would provide access to the bluff edge, thereby creating public view opportunities (see Responses 14-5 and 14-6 for discussion of view opportunities on the project site).

Comment 35-6:

> **Sewers:** We have some concerns as to the capacity of the existing sewer system along 80th Street as described in the report. Particularly since we are in the lowland area served by this system and will be among the first impacted if the capacity is exceeded. We would suggest as a possible third alternative that the new houses proposed along Rayford be connected to the system internal to the rest of the project regardless of the determination of the capacity of the existing 80th Street system. The Report indicates that it will be necessary to construct new sewer infrastructure in this areas in any case, thus it should not cause significant additional expense to route the flow into the new development as opposed to joining the current system.

Response 35-6:

As stated in Response 7-6, the project proponent is currently coordinating with the City of Los Angeles Department of Public Works in the preparation of a sewer plan to serve the proposed project. This plan will take into consideration the capacity of the current infrastructure of sewage lines both to the north and south of the project, and will require City approval prior to the start of construction.

Comment 35-7:

> **Storm Drains:** Mostly as a point of reference, we will report that during the heaviest of the rains this last season the lowlying portions of 81st through 85th streets just East of Hastings were subject to minor flooding (i.e. the running water in the street overflowed the curb height) for short periods. For longer periods the running water in the street was just below curb height, leaving the streets fully awash, but not overflowing into the sidewalk/lawn areas. Without exception that I am aware of, when the intensity of the rain decreased the system was able to handle the volumes and there was no standing water beyond the curbs for more than say 20 to 30 minutes. The addition of the homes along Rayford and 80th Street will increase the volume of water going into this storm drain system, which will probably increase the amount of time the water stands when these conditions are reached. We recognize that the conditions of the last winter will hopefully not often be reached, but they will occur.

Response 35-7:

Section IV.C.1, Surface Water Runoff/Hydrology, of the Subsequent Draft EIR (page 121) determined that nuisance flooding has been experienced at the Park Hill and Hastings Avenue intersections with 80th Street due to deficiencies in existing drainage capacities. As proposed, runoff from the project site following project implementation would be directed into the new storm drain system to be built as discussed on page 125 of the Subsequent Draft EIR. Thus runoff from the project site will not contribute to deficiencies of existing drainage capabilities.

Comment 35-8:

> **Vermin Mitigation:** We are concerned that when the construction begins vermin which are currently resident in the project area will be driven into the existing neighborhood. We have not seen any plan for mitigation of this condition or remedial action by the

developer should it occur. We would request that the developer be required to develop a plan which initially attempts to drive vermin into the undeveloped areas and provides services to the neighborhood residents to remove vermin if they do flee to the existing residential areas.

Response 35-8:

A supplemental construction mitigation program has been prepared by the applicant, which addresses the potential issue of vermin. See Response 13-11.

Comment 35-9:

Background and Supporting Arguments

The West Westchester, East Playa del Rey area has been developed in spurts since the initial post war housing units were constructed. Much of the land was originally owned by either the Hughes Corporation or Southern California Gas Company and their various successors. Until the mid 80's there was sufficient open space that neighborhood residents paid little heed to developments; with the result that several adverse decisions were allowed to be made. As the neighborhoods became more fully developed the results of these decisions became more apparent and we are now faced with the end results and must act to prevent additional erosion in the character of our neighborhood.

The West Bluffs area is the largest remaining open space area on the top of the bluffs and has several times been considered for development. As a part of the planning for earlier developments land areas have been "traded" and parcels designated as permanent open space if the development was to proceed. However, none of the earlier developments actually proceeded so the commitments for open space were not required to be honored. This has resulted in the slow erosion of contiguous areas that provide view points, potential recreation areas, or other aesthetic considerations. While none of the smaller developments has violated the letter of the various plans enacted to protect the nature of the neighborhood, the net result is clearly a violation of the spirit of the acts.

Response 35-9:

The comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 35-10:

Probably the most disappointing of the protective acts has been the "Big House" legislation. One look at the homes constructed on the peak of Veragua between Hulbert and Zayanta (not those on the bluff face itself) and its obvious that one can still build a structure that has more house than property-at least by all appearances. Homes of this size would clearly be inappropriate for the lots proposed in the West Bluffs project, except perhaps for one or two of the largest lots on the eastern side. Thus there needs to be deed restrictions to guarantee against such development since the zoning laws allow the possibility and the "Big House" acts have proven to be ineffective in this area. This is particularly important to retaining some semblance of a view from the existing homes and for those of us who regularly walk around the neighborhood for exercise and relaxation.

Response 35-10:

In response to public comments, a mitigation measure has been added to limit the height of homes built on the project site to 35 feet (see Section II, Corrections and Additions to the Subsequent Draft EIR). This height limit will be established by deed restriction. See also Response 31-4 for discussion of building setbacks and of publically-accessible view opportunities.

Comment 35-11:

Contiguous open space commitments have evaporated and traffic patterns been [*sic*] allowed to be created which have effectively eliminated the ability to support a public park of any significance in this area. Fortunately the proximity of Westchester Park provides for organized recreational space. What is slowly but surely disappearing is the availability of walking spaces with views of the ocean, the city, and the mountains and spaces for neighborhood "pickup games" be it soccer, football, baseball, tag, or frisbee.

Response 35-11:

The comment regarding the loss of views and open spaces is acknowledged. However, the proposed project includes the provision of dedicated open space. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, for changes to the proposed site plan regarding additional open space. This comment will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 35-12:

Traffic patterns were not properly addressed in earlier developments, creating a situation where a single intersection (Lincoln and 83rd St.) supports an inordinate amount of the traffic into and out of the area. Consider that even school busses utilize the residential Rayford St. and congested intersection at Lincoln and 83rd St. rather than go through the intersection at Lincoln and Manchester. This is true both in the mornings (when the turn onto Manchester from Lincoln is a right turn) and in the afternoons. Also when they are empty on the return trips. It is far easier for residents of the area between Lincoln and Gulana to travel the interior streets than it is to get access to Manchester. And neither intersection (83rd/Lincoln or Manchester/Lincoln) is anything to look forward to at most times of the day. The proposed traffic recommendations-as we understand they have been modified by the City-are acceptable to us, given the assumption that the dollar numbers quoted by the developer for the two phases are reasonable and adequate to make the planned modifications.

Response 35-12:

As described in the Subsequent Draft EIR Section IV.N.1, the intersection of Lincoln Boulevard and 83rd Street is a heavily utilized intersection within the study area, supporting traffic from the residences west of Lincoln Boulevard (north of Manchester Avenue) as well as an inordinate amount of cut-through traffic. The proposed Neighborhood Traffic Intrusion Program (NTIP) improvements will aid in reducing the neighborhood street utilization by cut-through traffic between Manchester Avenue and Lincoln Boulevard, as noted by the commentor. See also Responses 8-4 and 14-13.

Comment 35-13:

While it might be considered unfair to place the burden for rectifying these various problems-created by earlier developers-on the West Bluffs developer, we believe there are ways to at least prevent further abuse while still allowing the development to proceed with the number of residences currently planned. Some adjustments will need to be made in lot placements and sizing, but there is enough room to provide the additional open areas for use by the neighborhood and still retain the proposed number of dwellings. We are not swayed by the developer's calculations with respect to the number of homes which could theoretically be developed on the overall property. This is skewed by the higher density multi family zoning right along Lincoln Boulevard, and by the fact that the theoretical calculations involve areas where the property is not economically buildable. We feel that the developer has prepared a

plan that in fact maximizes the number of buildable properties while maintaining a character consistent with the existing neighborhood. Certainly the character of the neighborhood sought by the developer would not be met if a series of apartment buildings along Lincoln was included. And certainly we expect the developer to take advantage of certain terrain features to create a number of high value properties. Again, we feel that there is a reasonable approach which will meet the goals of the developer as well as those of the neighboring community.

We consider that the filling in of Hastings Canyon and the other areas with less significant erosion is in the best interest of the community. We also believe that it will assist in the maintenance of the wetlands below by reducing the alluvial fill coming off the bluffs. Certainly if Hastings Canyon is not filled, there will be an increasing danger for the existing homes on the hillsides as the erosion continues. And the wetlands below will continue to be filled as the bluff face tries to reach a stable condition.

Response 35-13:

A revised Tentative Tract Map that was submitted to the City reduced the number of proposed residential lots from 120 to 119 and provided additional open space. The underlying R1-1 zoning of the majority of the project site allows a minimum 5,000 sq.ft. lot size. If the current proposed residential lot area of the project (21.07 acres or 917,809 sq.ft.) is divided up into all minimum 5,000 sq.ft. lots (without taking credit for the R-3 zoning for the portion of the property along Lincoln Boulevard), the lot yield would be 183 lots (homes). This calculation does not include the entire project site (for example the bluff face is excluded). If the entire site were included, the calculation would yield a higher number of allowable lots.

The commentor's statements that the project maintains a character consistent with the existing neighborhood and that the filling of Hastings Canyon is in the best interest of the community is acknowledged for the record and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

Comment 35-14:

We then come to one of those grey areas with respect to land that is currently "owned" by the City in the form of a dedicated, but undeveloped, street-the extension of Hastings Avenue through the project property in general and in particular that portion which has a magnificent view of Santa Monica Bay and Marina del Rey as well as the wetlands and cityscape. In theory, we should have had access to this land lo these many years, but common sense allowed the

City's property to be included in the area fenced by the owner of the surrounding property. And the owner was not too persistent in keeping people out so the neighborhood was allowed tacit use most of the time. As the erosion continued, the street area fairly well eroded away, and use shifted to the adjacent perimeter areas. On the Fourth of July, for example, this area is a common spot for viewing the Fireworks displays across the City. Now, however, the developer intends to fill in this area for the purpose of building homes on the property, not as a dedicated street. So we have this mixed set of requirements and permissions. Certainly the developer should be allowed to exchange dedicated but undeveloped street areas to make the best use of the property overall. On the other hand, the current street property has value to the community beyond that of a simple street. We feel that a reasonable compromise is to allow the developer to exchange the areas and build homes on the site, but also to require that it set aside an area (or multiple smaller areas) with pedestrian access to the bluff face which preserve the views which the neighborhood has been enjoying while the site as undeveloped. Again, we are only concerned with pedestrian access, we do not require or want any vehicle parking associated with this publically accessible space.

Response 35-14:

Please refer to Response 31-6 for discussion of the Hastings Avenue extension, and Response 14-5 for discussion of trails and public access.

Comment 35-15:

Overall, we are not opposed to the development of this area as generally proposed in the EIR. The definition of "significant" varies from person to person; it is after all a subjective descriptor. Certainly the overall development has a "significant" impact in that it radically alters the state of the property. On the other hand, from the perspective of the overall development planned for the area, the project is generally consistent with those plans. The City of Los Angeles has not adopted a "no homes on bluff faces or ridge tops visible from the highways" that other areas have. Thus we must allow some intrusion in what is now open space viewing. With consideration for the items we have described above, we feel the EIR should be acceptable.

If you have any questions concerning our comments we may be reached at the above address and telephone number.

Response 35-15:

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

LETTER NO. 36
Signed by: Richard G. Harris and Ann Therese Canfield

July 6, 1998

7900 Hulbert Avenue
Playa del Rey, CA 90293

Re: Proposed "West Bluffs" Development [Tentative Tract # 51122]
Response to Subsequent Draft Environmental Impact Report
EIR No. 91-0675, State Clearinghouse No. 92041046

Comment 36-1:

As residents of Playa del Rey located approximately one block to the west of the proposed "West Bluffs" development, we wanted to provide our response to the Subsequent Draft Environmental Impact Report for the project, and our input concerning the development itself.

Although we have enjoyed the 'open space' provided by this undeveloped parcel of land, we recognize the rights of the developer to now proceed with a project along the lines of that proposed. We appreciate the interest which Catellus has shown in assessing neighborhood concerns over the proposed development and its willingness to modify the project in response to community input.

Generally, we are supportive of the proposed West Bluffs Development as modified through ongoing meetings with the community [See West Bluffs Steering Committee EIR Response Letter outlining additional modifications recently agreed to by the developer]. Our support however, is contingent on resolution of the following two issues which are of fundamental importance to the surrounding community:

A. Add a "Pedestrian Trail" on the Northwest Side of the Development Overlooking the Ballona Wetlands and the Santa Monica Bay; and

B. Ensure that "Emergency Only Access" at 79th Street/Berger Avenue Can never Be Converted to Allow Any Non-Emergency Vehicle Access of Any Type, at Any Time, for Any Reason

Response 36-1:

See Responses 14-5 and 34-2 regarding modifications to the pedestrian trail and emergency access, respectively.

Comment 36-2:

A "BLUFF PEDESTRIAN TRAIL" MUST BE INCLUDED ON THE NORTHWEST SIDE OF THE PROJECT (OVERLOOKING BALLONA WETLANDS)

The Northwest Portion of the West Bluffs Development overlooks the Ballona wetlands, Marina del Rey, the Santa Monica Bay and the Pacific Ocean. Each of these areas is a "jewel" of our Southern California landscape, which should be shared by all. The Ballona Wetlands in particular are in the process of being restored as one of the few remaining true wetland areas in Southern California. However, by allowing development of West Bluffs without a Pedestrian Trail or other means to overlook and view these treasures, we would be depriving the surrounding community of their ability to appreciate and enjoy them.

This omission can be easily rectified, without sacrifice of any land or lots from the West Bluff Development, through the addition of a new Pedestrian Trail around the northwest portion of the West Bluffs Development (behind lots 24-27 and lots 45-50), either using the 15+ foot setback/easement before property lines begin, or moving the path lower on the bluff face, below the level of the bluff-facing homes.

Response 36-2:

After distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified portions of the proposed site plan. Specifically, the new site plan includes additional open space and reconfiguration of the pedestrian trail. As described in the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, the proposed pedestrian trail down the bluff face to Cabora Drive, using the former radar/radio antenna site service road, has been eliminated. Access to Ballona Wetlands would be via the bluff path to the view park and then along "A" Street to Lincoln Boulevard onto Cabora Drive. In addition, the proposed pedestrian trail would be extended to the west behind Lots 15 through 27 and Lots 45 through 50. See Response 14-5 for a more detailed description of the proposed changes.

Comment 36-3:

Preferably, the Wests [*sic*] Bluffs Development should also include a Pedestrian Trail from the Development down to Cabora Road, either in the northwest corner of the development [depicted on past Project Site Maps (see e.g. Figure 4 at page 56 of the Draft EIR) as 'Veragua Walk'], or from the eastern side of the development near the 'view park'.

The currently depicted Pedestrian Trail on the North/Northeast portion of the West Bluffs property is not adequate and provides no views or enjoyment of the Wetlands, the Santa Monica Bay or the Pacific Ocean. Rather, it overlooks Lincoln Boulevard, and what will be the eastern side of the Playa Vista Project. Although this view park and northeast-side trail is appreciated and should be maintained also, it does not provide the sort of environmentally and aesthetically beneficial views which would be achieved through a Pedestrian Trail or access site at the Northwest portion of the project.

Response 36-3:

Please refer to Responses 14-5 and 14-6 regarding pedestrian trails and access to Cabora Drive.

Comment 36-4:

A Pedestrian Trail along that bluff face, behind lots 24-27 and lots 45-50, would provide clear, panoramic 180 degree views for the entire community satisfying the longstanding, fundamental Coastal Commission objective of access and enjoyment for all, in a manner which is environmentally compatible and which would maintain at least a small portion of the aesthetic benefit currently enjoyed by the surrounding community.

We strongly urge that any approval of the proposed West Bluffs Project be made contingent upon modification of the proposed project and the Draft EIR to include a Pedestrian Trail on the Northwest portion of the West Bluffs Project, behind and/or below proposed Lots # 24, 25, 26, 27 and 45, 46, 47, 48, 49 and 50, to provide a public view over the Ballona Wetlands, Marina del Rey and the Santa Monica Bay.

Response 36-4:

Please see Response 14-5 regarding modification of the pedestrian trail.

Comment 36-5:

ENSURE THAT THE 'EMERGENCY ACCESS' AT 79th STREET and BERGER AVENUE CAN NEVER BE CONVERTED TO ALLOW EITHER 'LOCAL' OR 'THROUGH ACCESS' OF VEHICLES

As the City and Developer are aware, there has been considerable concern over limiting vehicle access to and from the West Bluffs Development, and the impact which additional traffic and vehicle access sites may have on the community.

One of the key issues raised in community meetings was a desire not to develop any new access point from the surrounding community to Lincoln Boulevard, and a desire to discourage any increase in traffic through our community as a 'short cut' to Lincoln Boulevard, to Playa Vista, or to the 'west end' of LAX. Many hours were spent in community meetings between local residents and the developer to achieve this goal. It is imperative that this objective be maintained in any modifications of the proposed West Bluffs Development which may be considered as part of the EIR Review Process.

It has now been established that there will be only one means of resident or visitor access to West Bluffs, i.e. through the new "Street A" from Lincoln Boulevard.

Response 36-5:

As stated in the comment, the project applicant and traffic consultant worked extensively with the community to address traffic concerns. The proposed Tentative Tract Map has been designed to provide no access through the project from 80th Street or the surrounding neighborhood streets to Lincoln Boulevard. Access to all internal lots will be via "A" Street. Although no significant neighborhood street impacts would occur as a result of the project, an Neighborhood Traffic Intrusion Program (NTIP) will be provided. See also Response 34-2 regarding emergency access.

Comment 36-6:

Apparently fire or other safety regulations require that there be a second point of access to the development for use in the event of an emergency. The Developer has proposed that this "emergency only" access be at the end of the new "E Street", allowing emergency access from the intersection of 79th Street at Berger Avenue. This is with the specific understanding and

promise that such "emergency only access" can never be converted to allow other vehicle access of any type or for any reason.

The Developer has promised that legally valid covenants will be established to ensure that this access point will, formally and in perpetuity, be forever designated as "emergency only access", with no possibility that such access will ever be converted to a "through road" for any purpose, including use as a short cut for 'Resident Access'. The restriction to "emergency use only" must be strictly enforced and protected from any possibility of later conversion which could in any way allow other vehicle use. Approval of this proposed development must be conditioned upon a restrictive covenant to this effect.

Response 36-6:

See Response 34-2 regarding emergency access.

Comment 36-7:

HASTINGS AVENUE WOULD BE A BETTER 'EMERGENCY ACCESS' SITE

We feel compelled to again point out that 79th Street / Berger is not the most appropriate or 'best' access site for emergency use. Hastings Avenue would be far more suitable for many reasons. As such, from the onset of the proposed Development, we have objected to suggestions that the "emergency access" site be at 79th Street / Berger Avenue, and we again recommend that Hastings / 'G Street' be considered instead.

Previous development proposals provided for access sites at "G Street / Hastings Avenue" and at "A Street" / Park Hill Drive, as continuations of these existing north/south streets [See eg. Fig. 4 at page 56 of the Draft EIR]. We continue to believe that the Hastings Avenue / 'G Street' access makes the most sense. It provides the most direct and fastest access from Manchester Avenue, which would be the route taken by emergency vehicles. The proposed West Bluffs Development is five short blocks from Manchester via Hastings Avenue. By comparison, the route to 79th / Berger would be circuitous, requiring three right turns, a left turn, and travel through multiple stop signs. Hastings is also a wider street, as it has always been intended as a 'feeder' street for the surrounding neighborhood. Finally, it would allow for entry near the middle of the new development, rather than off in one remote comer.

It should be noted that the developer has now agreed to provide a 100 foot opening at Hastings Avenue, removing the two houses that had been designated for that location. As such, conversion of Hastings / 'G Street' to 'emergency only access' would not require further modifications of the proposed development plan by Catellus or the City, nor would it result in any change in the number of residential units which would be built in the project under current plans.

Response 36-7:

The 79th Street/Berger Avenue location for the emergency access gate was selected as a complement to the primary "A" Street access. This location allows direct access to those interior homes within the proposed West Bluffs development that are at the farthest point from "A" Street. Grade differentials between 80th Street at Hastings Avenue and Park Hill Drive, and "B" Street or "G" Street were also a factor. The commentor's concerns are noted. The Los Angeles Fire Department and Los Angeles Police Department have not expressed similar opinions. See Response 9-1.

Comment 36-8:

For each of these reasons, we urge that approval of the proposed West Bluffs Development be contingent on relocation of the 'emergency only' access site to Hastings Avenue where it intersects with the new 'G Street', and conversion of the proposed access site at 79th Street and Berger into an open, park-like area for community use.

Thank you for your past and continuing efforts to ensure that this proposed new development is as compatible as possible with the existing neighborhood, still providing some access to the bluff area which we all have grown to enjoy, and preserving for all of us some continued view of the Ballona Wetlands and the Santa Monica Bay.

Response 36-8:

See Response 36-7. These comments will be forwarded to the decision makers for consideration in reviewing the project proposal.

LETTER NO. 37
Signed by: Randall E. Hartman

July 6, 1998

21718 Marjorie Ave.
Torrance, CA 90503

RE: Draft EIR report no. 91-0675-SUB (CDP) (PP) (ZBA)

Comment 37-1:

I am writing in regards to the proposed development for 7400 block of 80th Street at Berger Avenue. This area is commonly known in the area as the "West bluffs". [*sic*] I am very familiar with the area and have spent many afternoons walking the open space, observing the diversity of wildlife, and taking in the spectacular views of the Ballona Wetlands and the Los Angeles Basin.

I am strongly against any development on this area because it is the last open space on the bluffs above the wetlands. This is an important area biologically because it is essentially part of, and an important link to the entire Ballona wetland ecosystem. This area is home to many animals, birds, burrowing owls, native plants, etc and provides an area for the animals to go when the wetlands flood.

Response 37-1:

The commentor's opposition to the proposed project is noted, and will be referred to the decision makers for consideration in reviewing the project proposal. However, as stated in the Subsequent Draft EIR, the proposed project includes the provision of dedicated open space. Further, the applicant has modified the site plan to allow for more open space. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, for details of the modified site plan.

As stated in the Subsequent Draft EIR, project-related impacts associated with biological resources would not be significant. However, the comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal. Please refer to Responses 13-3 through 13-6 for discussion of the sensitivity of biological resources on the project site.

Comment 37-2:

It is a beautiful area and since it is the last open space above the wetlands it should be preserved as a park with state and federal funds that are available for this purpose.

Response 37-2:

There is no known state, federal or other public funding available to purchase the site for use as a park. The Subsequent Draft EIR (Section IV, Alternatives) included an analysis of an alternative use of the project site as a community park. However, there have been no proposals to purchase the site from the applicant for the purpose of preserving biological resources, and implementation of this alternative was considered remote and speculative. Per the requirements of the California Environmental Quality Act (CEQA), alternatives to the proposed project considered in the environmental analysis must be feasible. Therefore, this alternative was eliminated from further consideration. However, the comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 37-3:

This area is also has [*sic*] historical and archeological significance because it is the site of an ancient Indian village of the Gabrialino [*sic*] Indians.

Response 37-3:

As stated in the Subsequent Draft EIR, the project site contains two significant archaeological sites (LAN-63 and-64). The main occupation of the site predates the Gabrielino (who lived in Los Angeles long after the West Bluff sites had been abandoned), and there is no evidence that they were used as major villages during protohistoric times. Mitigation of the significant resources has already been accomplished (see Subsequent Draft EIR page 371 and Response 34–8); additional monitoring will ensure that unique and important features and burials are handled appropriately.

Comment 37-4:

The few homes that will be built here are not needed and there are plenty of other areas in the City of Los Angeles that are truly in need of development or redevelopment, especially in the inner city. Please do not approve this project and please do not turn over the land on the slopes

of the bluffs away from the jurisdiction of the California Coastal Commission. Thank you for your time and allowing the public to comment on this project. If there is any public forums [*sic*] on this development I would gladly like to be informed.

Response 37-4:

This comment will be forwarded to the decision makers for their consideration. Please see Response 17-3 regarding the project site acreage to be located in the Coastal Zone. The commentor's name and address (along with those of all commentors) will be added to the Department of City Planning's mailing list for notification of public hearings concerning this project.

LETTER NO. 38
Signed by: Kelli G. Hawley and Craig C. Adams

July 6, 1998

7500 West 80th Street
Westchester, CA 90045

RE: **Response and Position Statement for the West Bluffs**
E.I.R. No. 91-0675
West Bluffs Development-Tentative Tract No. 51122

Comment 38-1:

This letter will serve to respond to the Environmental Impact Report referenced above. The undersigneds' property is located directly across the street from the proposed development and will be among the most seriously impacted properties. We wish to express our concerns regarding increased traffic, loss of our view, loss of the open bluff face area, the effects of grading on our property, and the desire for recreational space.

Response 38-1:

These concerns will be forwarded to the decision makers for their consideration. See Responses 38-2 through 38-6.

Comment 38-2:

One of the main concerns expressed by our neighborhood, and shared by us, is for the increased traffic and its burden on our neighborhood. While we participated in the traffic discussions with the proposed developer, we can only underscore here the significant impact of traffic on our area. Our streets are already impacted by the recent development of many lots in the area. Further development, as proposed, will only exacerbate our already overburdened streets. If the project is allowed, serious consideration must be given to traffic mitigation and we must receive serious concessions from the developer to implement them.

Response 38-2:

The traffic study performed as part of the Subsequent Draft EIR and summarized in Section IV.N.1 fully examined the effects of the project, normal ambient traffic growth, and 23 specifically-identified area development projects. It concluded that the project will not result in significant traffic impacts at any of the nearby intersections examined in detail, nor will it produce significant impacts on the neighborhood streets within the surrounding neighborhoods. Nonetheless, the developer proposes to implement a comprehensive Neighborhood Traffic Intrusion Program (NTIP) to address neighborhood concerns regarding existing cut-through traffic. See Responses 5-4, 8-4, 14-12, 25-4, 31-7, and 35-12.

Comment 38-3:

Addressing the loss of our view, I do not need to labor this point unnecessarily. Each individual in the City Planning Department knows the property value of the view we currently enjoy as well as the aesthetic enjoyment it engenders. This loss to us is priceless and should be considered adequately and fairly.

Response 38-3:

Please see Response 25-7 regarding analysis of an individual's property's economic value. The commentor's concerns are acknowledged and will be forwarded to the decision makers for their consideration.

Comment 38-4:

We cannot fail to address the loss of the open bluff face. While one cannot argue with the private property rights of the Hughes Corporation, the loss of the bluff is the loss of a natural resource and beauty we can never replace. Its present existence enhances our coastline and our community. We advocate serious consideration of the effects of its loss on the natural habitat as well as on the face of our community.

Response 38-4:

The comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal. However, as stated in the Subsequent Draft EIR (page 148), on-site bluff faces are not proposed for development and would not be removed or reduced by

project implementation, except by the construction of "A" Street and filling of small erosive drainages for the purposes of slope stability and safety. Further, as part of the proposed project, the bluff face would be restored with sage scrub habitat and would have a net beneficial impact upon wildlife on the project site and in the project area (page 18 of the Subsequent Draft EIR).

In addition, the proposed project includes the provision of open space, and after distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan to include additional open space and a reconfiguration of the pedestrian trail. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of the proposed modifications.

Comment 38-5:

Another major consideration is the effect of grading on our property. Currently, the property acts as a natural runoff for rainwater in our area. Most of the neighborhood drains to 80th Street. Grading and development of the property will change the character of the natural drainage and may have a serious impact upon our property. Already, our lot acts as a low spot and ponds seriously in heavy rains as experienced in the last few years. We countered that condition by installing additional drainage in our yard. However, we worry that the significant grading necessary for a project as proposed will alter the character of our lot and cause serious damage. Furthermore, in that the general character of the Hughes property is wet and ponds significantly during the winter months, we question the residential development, as proposed, as it may contribute to the growth of molds and mildew which are hazardous and harmful.

Response 38-5:

The project proposes grading and a new on-site storm drain system that will divert a significant amount of storm water runoff away from 80th Street. New storm drain catch basins are proposed to be constructed at 80th Street and Hastings Avenue and at 80th Street and Park Hill Drive where none exist currently. This should have the effect of draining the storm and nuisance water off faster and not allowing it to collect as much at these intersections. Grading of on-site lots will be designed to drain away from homes. No ponds or depressions will be created or left on-site with the proposed grading. The residential development as proposed is not anticipated to contribute to the growth of molds and mildew. No offsite grading on any of

the existing residential lots on the south side of 80th Street is proposed. Thus, project implementation will not create additional nuisance ponding to off-site areas.

Comment 38-6:

Finally, we support the position of the West Bluffs Steering Committee in calling for an open space for recreational use to be shared by all residents of the area. We appreciate and enjoy the beauty of this natural space and will sorely miss it if the development proceeds.

Thank you for your consideration of our views expressed herein. Should you wish to discuss these matters further, please feel free to contact Kelli Hawley at home at (310) 649-2080 or at her office, (626) 440-9882.

Response 38-6:

Open space/recreation areas are proposed for public use under the proposed project. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a description of the proposed modifications regarding the additional open space and reconfiguration of the pedestrian trail. The comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

LETTER NO. 39
Signed by: Harriet Hofmann; Edward & Cathy Herrera

July 8, 1998

Harriet Hofmann
7343 W 83rd Street
Los Angeles, CA 90045

Edward & Cathy Herrera
7340 W 82nd Street
Los Angeles, CA 90045

Comment 39-1:

We have some concerns we would like to express to you about the West Bluffs Development Project.

ace [*sic*] with bluff access is a major concern. There is not enough open space which would allow the community to enjoy the view of the Pacific Ocean and the Ballona Wetlands. We feel that the developer will use as much of the land as possible for homes and will not even consider the rest of the community.

Response 39-1:

The comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal. However, the proposed project does include the provision of dedicated open space for public use. Further, after distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan to include additional open space and reconfiguration of the pedestrian trail. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of the proposed modifications.

Comment 39-2:

Another concern is the height of the new houses on 80th Street. These homes should be at the height of the other homes on 80th and the grading should be at the same level.

Response 39-2:

See Response 40-2 for details regarding this issue.

Comment 39-3:

We also are very concerned about the traffic that will definitely impact our streets. What will the developers really do to help the situation? Also, the trucks that will be driving on our streets when the construction begins need to be stopped. The developer should build a road first inside the development so the trucks will not disturb our neighborhood. All their materials could be brought off Lincoln Blvd and not through the Westchester community.

These improvements should be made first so that the developer does as he says he will.

Response 39-3:

Construction operations will be designed to avoid impacting residential areas. See Response 25-6 regarding construction traffic.

Comment 39-4:

Our last concern is a real park or parks. We have been in other developments where there are parks and spaces for everyone to play and picnic with their families. The developer says we don't need these parks because it will draw an unsavory group of people. The developer says they will donate money to other parks. Why not in West Bluff? The residence need a place to enjoy with their families. They will be paying a high price for the homes. The developers could give them something to enjoy.

Please know these are not just our concerns, but many of our neighbors feel the same way.

Response 39-4:

The comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal. However, the proposed project does include the provision of dedicated open space and recreation areas. Further, after distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan to include additional open space and a reconfiguration of the pedestrian trail. Reconfiguration of

the pedestrian trail would allow greater public access to views of Ballona Wetlands and beyond. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of the proposed modifications regarding additional open space and reconfiguration of the pedestrian trail.

LETTER NO. 40
Signed by: Julian J. and Marline Horowitz

July 8, 1998

7540 W. 80th Street
Los Angeles, CA 90045

EIR 91-0675
West Bluffs Development-Tentative Tract #51122
Response + Position Statement for the West Bluffs

Comment 40-1:

Though this letter is short & to the point it expresses the feelings & concerns of a substantial number of neighbors, residents, & voters in the West Bluffs area. We are deeply annoyed at the planned development for this area. First, we believe that this development should not proceed at all, but should be preserved to protect the plant & animal species that are currently in existence because of the wetlands & [*sic*] would be obliterated if the West Bluffs were to be developed for homes. Further, the area should be designated for park & recreational areas to benefit the community as a whole.

Despite our opposition to the development as a whole, if by chance the environmental report is approved & work does proceed, consideration should be given to the rights, benefits & feelings of all parties that will be affected including loss of view, health hazard etc.

Response 40-1:

As stated in the Subsequent Draft EIR, no significant impacts are anticipated to biological resources or the Ballona Wetlands. Further, there are no hazardous materials on, or adjacent to the project site, and it was determined in the Initial Study that environmental safety issues would not be significant. However, it was acknowledged in the Subsequent Draft EIR that development of the proposed project would result in a significant view impact for some residences and other public vantages immediately south of the site. The opposition expressed in this comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 40-2:

I and my neighbors are upset & concerned over the planned grading, particularly along the 80th street [*sic*] & Rayford St. Corridor. The developer is planning to raise some building pads as much as 15 ft. rather than putting them at street level in conformity with the houses already existing across the street from the building area. Would you enjoy looking out your window at a building pad 15 feet high? If anything, the builder should give thought to & grade down from the existing grade in order to preserve the ocean & city views.

Response 40-2:

Generally all of the proposed building pads of the 29 project lots on 80th Street and Rayford Drive are designed to be near the same grade as these streets. Typically on average where the adjoining streets are relatively level, these lots may be two feet higher than the street (rising from the front of the lot towards the back) in order so the lots drain back towards the street as is the City requirement (cross drainage between lots is not allowed). None of the building pads of the lots fronting these streets will be 15 feet higher than the street as stated in the comment. Because portions of 80th Street and Rayford Drive as they front the project site are on hills, it is infeasible for the proposed relatively flat building pads to stay completely level with the street in these areas. Therefore, in areas such as immediately east of Berger Avenue where 80th Street drops down sharply, there are proposed building pads that are 0 to 2 feet above the street on one side of the lot and as much as 8 feet above the street on the other side of the lot because the street falls away. This situation is similar to the existing lots on the south (opposite) side of 80th Street and Rayford Drive.

Because existing grades on some area of the site are lower than the existing elevations on 80th Street immediately fronting these areas, portions of proposed Lots 73 through 87 are from 0 to 15 feet higher than the existing grade. However, because 80th Street is higher in these areas, the difference between the proposed building pad and the street is not as great.

The October 1998 revised tentative tract map lowers the project interior lots in the west half of the site from what was proposed in the Subsequent Draft EIR. In the revised plan, all project interior lots 90 degrees out from any point on 80th Street are approximately at the same elevation or lower than the respective lots on 80th Street at that point. Portions of proposed Lots 62 through 67 are still 5 to 7 feet above existing grade; however, existing grade in these areas is lower than 80th Street. These lots are raised to achieve required drainage, but as previously noted, are not measurably higher than lots on 80th Street. Other proposed lots in the

area of the high knoll in the northwest portion of the site will be lowered as much as 20 feet from existing grade. Therefore, although portions of the site are being raised, other portions of the site are being lowered to the same elevation so the net change in view impact is neutral. Generally, all project lots in the revised plan are at the approximate same elevation or lower than the proposed lots on 80th Street on a 90 degree tangent from 80th Street at any particular point. (See also Response 41-19.)

In addition, a building height limit of 35 feet will be imposed by deed restriction. A mitigation measure to this effect is added (see Section II, Corrections and Additions to the Subsequent Draft EIR).

It was acknowledged in the Subsequent Draft EIR that development of the proposed project would result in a significant view impact for some residences and other public vantages immediately south of the site. Impacts would be slightly reduced by the added mitigation measure, but would remain significant. The comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

LETTER NO. 41
Signed by: Steve and Elaine Kane

July 2, 1998

7452 W. 80th Street
Westchester, CA 90045

E.I.R. No. 91-0675
West Bluffs Development-Tentative Tract No. 51122
Response and Position Statement for the West Bluffs

Comment 41-1:

Attached is our response to the West Bluffs EIR. Thank you for your help over the last few months. Please keep the communication lines open so that I can keep the community informed.

We appreciate all your efforts and those of the other city departments in the formation and design of the project. We look forward to working with you and the developers in the process of finalizing this project.

Response 41-1:

This comment is an introductory paragraph to the commentor's letter and does not require a separate response.

Comment 41-2:

RECREATIONAL AND PARK SPACE

We agree with the Friends of Ballona Wetlands; ".....a series of developments east of Lincoln Blvd. have consumed all other remnants of this type of landscape..... The small amount of space dedicated for public use by the proposal is not adequate. If the development is permitted, a requirement for more dedicated open space should be administered."

Councilwoman Ruth Galanter stated in her May 6, **1992**, letter to the City Planing Department regarding West Bluffs. "Proposed for a community very sensitive to development pressures,

West Bluff is also located in an area informally used by local residents for recreation over portions of number of decades..... The site potentially provides significant public views of the Pacific Ocean the Ballona Wetlands and the westside of Los Angeles. The project should be designed to include and encourage public viewing areas..... While this site has not been consistently accessible to the general public over the years, it does lie in a community both statistically and realistically short of recreational open space. Any proposed project should provide as much open space as is feasible, both for passive and active recreation..... If the City is going to consider approval of a subdivision on this site, we have an obligation to maximize public amenities and environmental protections while minimizing impacts on the surrounding community..... I urge the Department to pursue these goals vigorously..."

Response 41-2:

It should be noted that the letter quoted from Councilwoman Galanter (dated May 6, 1992) is in regards to the previously proposed project. Comments specifically for the currently proposed project have not been received from the Councilwoman.

The comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal. However, as stated in the Subsequent Draft EIR, the proposed project would include the provision of dedicated open space and recreational areas for public use. Further, after distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan to include additional open space and a reconfiguration of the pedestrian trail. Reconfiguration of the pedestrian trail would allow greater public access to views of Ballona Wetlands and beyond. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of the proposed modifications regarding additional open space and reconfiguration of the pedestrian trail.

Comment 41-3:

An April **15, 1992** letter from Frank S. Catania, Director, City of L.A. Dept of Recreation and Parks states "..... There is need for a larger park (4 or 5 acres min) in this area, particularly to serve this subdivision."

Response 41-3:

As stated above (Response 41-2), the applicant has modified the proposed site plan to include additional dedicated open space. The Subsequent Draft EIR indicated that approximately 16.75 acres of open space would be included as part of the project. The modified site plan includes 17.33 acres of open space, of which 1.96 acres would be dedicated as recreation/park use. As discussed in the Subsequent Draft EIR (page 290), the park requirements as established by Section 17.12 of the Municipal Code is 2.1 acres. Although the proposed changes increase the amount of dedicated park land, it is less than that which is required. Therefore, if the project is approved, the decision makers may require additional land dedication, the provisions of private park space for residents or the payment of in-lieu fees as mitigation. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of changes regarding the pedestrian trail and the additional open space as proposed under the modified site plan.

Comment 41-4:

The California Coastal Act states in part ".....maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone ....."

The Coastal Bluffs Specific Plan states in part "..... To assure that maximum public access to the coast and public recreation area is provided." Recent development in the community over the last few years has added over **230** homes with more to come.

Response 41-4:

The project site is currently fenced, as discussed in Section IV.H, Land Use, of the Subsequent Draft EIR. Project implementation would provide access to the bluff top which is not currently legally available. The Land Use analysis further stated that, although significant view impacts from some vantages would occur as the result of project implementation, taking into consideration the increased setback distance of residences from the bluff edge and the new public view opportunities in the proposed view park and pedestrian trail, project implementation is in compliance with applicable Coastal Act policies (please see Response 57-3). Refer to Responses 14-5 and 14-6 for discussion of the view park and trail.

The comment is noted and will be forwarded to the decision makers for review and consideration in reviewing the project proposal.

Comment 41-5:

SEE THE ATTACHED SCHEDLULE [*sic*]

This recent addition of new homes in the community does not include the proposed West Bluffs. None of this development has provided the community with any park and rec. space. West Bluffs is the last undeveloped space in the area. Hughes and Catellus were aware of this before the property exchanged hands in December of 1997. Numerous meetings were held discussing this and other issues. Page 285 of the EIR states "...Local Recreational Standards, representing the city's long range planning goals, call for a minimum of four acres of parks per 1000 residents. Based on the city's adopted standards, the City of Los Angeles is currently experiencing a park space deficiency, and no area of the city is adequately served by the neighborhood and community recreation and park facilities."

The addition of the 120 homes in West Bluffs added to the over 230 recent new homes in Pacific Heights and the P.D.R. Bluff area, added on to the development of the approximately 60 additional vacant lots in the area, adds up to over 400 new homes in the immediate area. With the average new home expected to have about 3 occupants, that totals about 1200 new residents. Based on this new resident population and the above mentioned city criteria, the area should have a minimum four acres of park and rec. space. Considering the lack of park and rec. space provided this community resulting from the past developments in the area, every possible square foot of land legally and morally available to the community should be set aside for park and rec. space. Hughes should be morally obligated to participate in the acquisition of this space for the community since they were the primary land owners of the property sold and developed in recent years.

Response 41-5:

Refer to Response 41-3 for discussion of project open space elements.

Comment 41-6:

2.1 acres of park and rec. space should be provided to the community under section 17.12 of the City Municipal code. **Morally and possibly legally, the acreage (.8 acres) in Hastings Canyon consisting of Hastings Ave and Veragua walk, both public rights of way, should be traded for park and rec. space within the development. This area has been used by the community for recreational purposes and access for many years and a prescriptive**

easement in favor of the community may exist. This would increase the total park and rec. space available to the community to about 3 acres still below the four acres recommended by the city. The development of property an top of Hastings Canyon provides Catellus with huge economic benefits that would not he realized without such a land reconfiguration as filling in the canyon requires. With the City's cooperation and help, some of that benefit can be morally and possibly rightfully shared with the community by the provision of an appropriate amount of Park and Rec. Space.

Page 354 of the 1998 EIR states "some of the building pads would be **created** by filling the large erosional features on the west end of the site (Hastings Canyon)."

According to the 1998 EIR the Hastings Canyon area comprises about 9 acres of land.

Page 193-194 of the 1998 EIR indicates the acreage of tract 9167 including Hastings Ave to be about 5 acres. Pages 197 to 207 of the 1991 EIR describes in detail the 23 lots in tract 9167 which is proposed to be resubdivided as part of the new West Bluffs development. These 23 lots surrounding Hastings Canyon are downslope lots with more limited building restrictions and quite possibly, economically and environmentally unfeasible to build on. Page 207 of the 1991 EIR states " the proposed project would supersede the entitled subdivision of Tract 9167. Instead of 23 lots, the project would contain 14 larger lots on a section of this site." These 14 lots would probably have different building capabilities **since they would now be virtually flat as opposed to sloped.** However, they would now cover up a large view corridor with views of the ocean, enjoyed by the whole community.

Page 197 of the 1998 EIR describes the Coastal Zone Boundary as following the existing bluff top features and lot lines of the existing lots within tract no. 9167 (Hastings Canyon). The boundary of the Coastal Zone **in Hastings Canyon apparently needs to he adjusted as part of the entitlement process since the current Coastal Zone Boundary appears to follow the bluff top surrounding Hastings Canyon.**

Page 192 of the 1991 EIR states " In September 1990, the Coastal Commissioners adjusted the southern boundary of the Coastal Zone to its current placement at the edge of the top of the bluffs." Hastings Canyon is within that area.

Response 41-6:

Please see Response 41-3 for discussion of the amount of park space required and mitigation options available if the required amount is unavailable. Refer also to Responses 14-5 and 31-6 for discussion of the Hastings Avenue and Veragua Walk rights-of-way with respect to public access. As noted by the commentor, re-subdivision of Tentative Tract Map 9167 reduces the number of lots from 23 to 14, reducing density across the site.

The proposed Coastal Zone boundary adjustment is shown in Figure 18 in Section IV.H, Land Use (page 178), of the Subsequent Draft EIR. While a portion of Hastings Canyon would no longer be located within the Coastal Zone, an additional 2.37 acres of the project site would be newly located within the Coastal Zone (please see Response 17-3 regarding the project site acreage to be located in the Coastal Zone). The boundary change will have the effect of placing more of the bluff face and northern edge of the bluff top within the Coastal Zone.

Comment 41-7:

See attached copy of boundary edge of bluff tops.

The developer would seemingly like the community's, the city's, and the Coastal Commission's support for this proposal.

It seems rather unfair and improper that the developer would have so much to gain with the many concessions that appear to have to be made, and ask so much of the community to give in support and then try to "shave" the amount of park and rec. space that the community desperately needs, deserve [*sic*] and is fairly entitled to.

A condition of approval from the city and all regulatory agencies, including the Coastal Commission, as part of this subdivision and the re-subdivision of Tract 9167 should be the dedication of .8 acres of park and rec. land (comparable to Hastings Ave and Veragua Walk) as an even exchange. This would be in addition to the 2.1 acres required under section 17.12 of the city code.

The park and rec. space requested by the community should be placed in appropriate locations throughout the development agreed upon by the city, the developer and the community.

As noted above, the overwhelming opinion of the community, its political representatives, and the various relevant laws and regulations insist that the public park and rec. space be maximized not minimized.

It is our position, as is the opinion of almost everyone in the community, that the open space available for active human use should be at least 3 acres.

This active recreational space should be placed in appropriate locations throughout the development consistent with the needs of the community and the developer.

Response 41-7:

The comment is acknowledged and will be forwarded to the decision makers for their review and consideration in reviewing the project proposal. Refer to Response 41-3 for discussion of project breakdown of open space. Refer also to Response 13-7 for discussion of modifications to the Tentative Tract Map and regarding the location of open space on the project site. Please see Responses 7-11 and 31-6 for discussion of the Hastings Avenue and Veragua Walk rights-of-way with respect to public access and park land.

Comment 41-8:

AESTHETICS AND VIEWS

The Coastal Bluffs Specific Plan states in part "..... to implement the policies and objectives of the Scenic Highways Plan, ...the Open Space Plan..... To protect, maintain, enhance ..... restore the overall quality of the coastal environment..... to regulate all development..... in order to provide for the protection and enhancement of views of scenic features visible from scenic corridors and scenic highways and to assure that development is compatible in character with the existing community. To preserve and protect the unique and distinctive land forms within the specific plan area ....."

The Scenic Highways Plan has the following objectives: to preserve and enhance existing scenic resources; to create a coordinated and integrated system of scenic highways and corridors that strengthens the city's image, maximizes views from public ways, and provides access to enjoyable scenic resources; to provide for the protection and enhancement of views of scenic features within or visible from scenic corridors ....."

The California Coastal Act states in part "...the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be **sited and designed** to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated by the Dept. of Parks and Rec. and by local government shall be **subordinate** to the character of its setting.

Response 41-8:

Section IV.H, Land Use, of the Subsequent Draft EIR discusses the proposed project consistency with the California Coastal Act, the Coastal Bluffs Specific Plan and the Scenic Highways Plan. As presented in the Land Use section starting on page 197, the proposed project was found to be consistent with the Coastal Act, the Bluffs Specific Plan and the Scenic Highways Plan. The proposed project is not located within a highly scenic area as designated in the Department of Parks and Recreation California Coastline Preservation and Recreation Plan. However, the project would be developed in accordance and consistent with the development criteria for scenic corridors, and would not result in significant impacts in terms of consistency with the Scenic Highways Plan.

Comment 41-9:

An April 14, 1992 letter from the City of El Segundo, project planner, Nancy Hutar stated in part "...the statement under aesthetics and views states that the project ..... could affect views from adjacent residential areas....." she further states..."...because of this, mitigation measures should also include alternative designs of the units or lots so that an **attempt is made to preserve existing views and not merely to screen rooftop equipment."**

Response 41-9:

It should be noted that the letter quoted from the City of El Segundo (dated April 14, 1992) is in regard to the previously proposed project. A subsequent letter received from Laurie B. Jester of the City of El Segundo (see Letter 10) regarding the current project, states that the City of El Segundo has no comments on the Subsequent Draft EIR or project. Following circulation of the Subsequent Draft EIR, the project proponent proposed modifications to the project design which affected open space and visual resources. See the revised Project

Description in Section II, Corrections and Additions to the Subsequent Draft EIR and Response 14-5 for a detailed description of the changes.

Comment 41-10:

In his May 4, 1992 letter, L.A. City Planner G. David Lessley, Principal City Planner, stated in part ".....**the proposed development should retain all existing vista points and minimize alteration of natural landforms.** [*sic*]

Response 41-10:

It should be noted that the letter quoted from the City of Los Angeles (dated May 4, 1992) is in regard to the previously proposed project. Following circulation of the Subsequent Draft EIR, the project applicant proposed modifications to the project design. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR and Response 14-5, regarding modifications in the site plan to allow for greater public access to views north of the project site.

The object of grading is to prepare the proposed project site to meet all the applicable provisions of the City of Los Angeles Building Code and Zoning Code, as well as seismic design criteria included within the Uniform Building Code. As a result of grading, changes in topography would range in elevation from 1 to 20 feet, with the largest change associated with filling of Hastings Canyon and correction of erosional features on the site (see Subsequent Draft EIR, Figure 52, Cross Sections A & B, page 356). As stated in the Subsequent Draft EIR (page 80), although Hastings Canyon would be filled, this feature is a result of urban runoff and is not considered a unique physical feature. Therefore, no significant impacts are anticipated.

Comment 41-11:

Page 358 of the EIR states in part "The project would alter the aesthetic environment and the views of the neighborhood to the south of the project site..... Development of the site would also limit views..... and would limit views from neighborhood streets south of the project site..... another change..... is the blockage of distance views of city lights.....the loss has been determined to be adverse...."

Page 341 of the 1991 EIR states "the project would inhibit views extending beyond the project site to the Santa Monica Bay area and the mountains which are unique and not readily available elsewhere."

Page 365 of the 1998 EIR states "However, development of the site even after mitigation measures would significantly impact views from some homes and public vantages south of the project site and from some areas north of the project site..... The previous EIR identified significant project impacts to views and aesthetics from the neighborhood south of the project site and to the scenic highway north of the project site."

Response 41-11:

This comment quotes the 1993 EIR (not the 1991 EIR referred to by the commentor) and Subsequent Draft EIR and points out differences in the significance determinations reached in the two documents regarding visual resources. Both the previous EIR and Subsequent Draft EIR found significant impacts to views from the areas to the south and north of the project site. However, Section IV.S, Aesthetics and Views, of the Subsequent Draft EIR, determined that impacts to Culver Boulevard, a scenic highway, would be adverse but less than significant, given the small portion of the viewshed that would be affected and the lower profile against the skyline of the proposed homes as compared to the existing bluff edge homes on Berger Avenue. In addition, the Subsequent Draft EIR concluded that cumulative impacts to views and aesthetics would be considered adverse but less than significant because the bluff top has been extensively urbanized since the EIR was prepared in 1993 and the proposed project, as the last large vacant site on the bluff, would largely complete the bluff top's conversion to urban uses.

Comment 41-12:

It is our position supported by many, that more should be done with the buildings and lots on 80th-Rayford Street to minimize the negative impacts associated with the aesthetics and views. This could be accomplished by greater side yards between homes, building designs and elevations that might better mitigate the negative impacts, smaller building square footages on the same size lots, architectural designs that are more compatible and allow greater view corridors and view opportunities for the community.

Also, the loss of prominent view points enjoyed by the whole community, like ocean views through Hastings Canyon, should be replaced with more view parks connected by a bluff top trail. This would be more in line with the "spirit" and letter of the applicable laws and help to

mitigate the negative impacts and losses to the whole community which were highlighted above.

Response 41-12:

A building height limit of 35 feet will be imposed by deed restriction. A mitigation measure to this effect is added, see Section II, Corrections and Additions to the Subsequent Draft EIR. This height is lower than the maximum height of 45 feet, currently allowed by City code. Many homes adjacent to the site are one story, others are two-and three-story units. Grading of the project site will, in some areas, result in lower elevations than currently exist. Development of the proposed project would not conflict with City regulations and would be compatible or complementary with the character of surrounding existing residential areas. However, it was acknowledged in the Subsequent Draft EIR, that development of the proposed project would result in a significant view impact for some residences and other public vantages immediately south of the site. The comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal. See Response 41-2 regarding modifications in the site plan to allow for greater public access to views north of the project site.

Comment 41-13:

TRAFFIC

The traffic plan developed by the community over the last several months is generally acceptable. Addition and deletion of items for the phase 1 improvements should be worked out with the L.A. City DOT and Catellus. One addition should be a stop sign at 81st and Colegio. We would like to work out the details with the community and DOT prior to the issuance of any building permits for the development.

Response 41-13:

A stop sign at 81st Street and Colegio is not currently proposed, but may be included in Phase II, as stated in Response 14-12. See also Responses 8-3 and 8-4.

Comment 41-14:

We feel, along with the other 80th Street residents, that the second phase of the traffic improvements should not be started until **at least one year** after the occupation of all **the homes on 80th street and Phase 1 traffic improvements are put in.**

We and the community feel that additional funds should be made available for improvements at 83rd and Lincoln if phase 2 shows that improvements are necessary. Improvements could include, two left hand turn lanes going north and the widening of 83rd. [*sic*] between Lincoln and Colegio. Additional funds could come from Hughes, Catellus, the City, the Gas Co., LAX, and Playa Vista. The City had noted certain improvements to be made to 83rd and Lincoln in the original 1991 EIR.

Response 41-14:

See Response 8-4.

The improvements noted in the original Project EIR have been updated by the current Subsequent Draft EIR. The revised project is not expected to significantly impact the intersection of Lincoln Boulevard and 83rd Street, and no improvements are warranted at this location. Further, the improvement of Lincoln Boulevard with two northbound left-turn lanes would encourage the use of 83rd Street, which is at odds with the stated intent of the Neighborhood Traffic Intrusion Program (NTIP). See also Responses 14-13 and 35-12.

Comment 41-15:

The necessity of 3 speed bumps on 83rd Street needs to be evaluated. One of the bumps appears to be in a graded area that exceeds the 5% city grade requirement and the short block criteria. This was never put to a community discussion. Two speed bumps were eliminated on 80th Street because the City's DOT did not feel they met the 5% grade requirement. The developers decided not to issue a bond to insulate the City from any liability for the installation of these bumps. The City suggested alternatives to the safety issue at the crest on 80th. [*sic*] Street. We would like to work with DOT and Catellus in developing an acceptable alternative that would not shift any traffic volume to 81st. [*sic*] Street and eliminate the unsafe nature of this part of the roadway.

Response 41-15:

The applicant is, and has been, working with LADOT staff on all design elements of the NTIP, including the speed humps on 83rd Street, and their removal from 80th Street. It is the belief of LADOT and the applicant that the 80th Street speeds humps can be designed and implemented to adhere to LADOT's policies and procedures. See Responses 8-4, 14-12, and 31-7.

Comment 41-16:

Cumulative effects of the West Bluffs development along with the future development of the remaining vacant lots in the area need to be addressed as to the impacts on 83rd and Lincoln, 83rd. [*sic*] Street, 80th. [*sic*] Street, and Colegio. This cumulative effect needs to be mitigated. Our evaluation indicates that the cumulative impacts of West Bluffs and the development of the additional vacant lots in the community would have a significant impact on the neighborhood traffic levels. Page 253 of the EIR indicates the project impact for traffic volume on 80th. [*sic*] Street to be 8.35 % which is below the City's DOT level of significance of 12%. Our study showed that of the 310 car trips generated by the new homes on 80th. [*sic*] Street, 75% or 233 car trips would be added to the existing volume of cars on 80th. [*sic*] Street. This represents a 19% increase in traffic volume on 80th. street [*sic*] and consequently the addition of the new homes from the project adds a car volume that exceeds, the City's threshold of significance of 12%. This fact in addition to the cumulative impact from future residential development in the area, mandates that mitigation measures for 80th Street be developed to deal with this problem. The cumulative impact of the future development of the vacant lots to the west of 80th. [*sic*] Street along with the development of West Bluffs could raise the traffic volume on 80th Street over 30% in the future. This significant cumulative impact needs to be recognized, and mitigated.

Response 41-16:

The cumulative effects of the nearby potential residential developments are included in the traffic analyses. The commentor does not disclose his assumptions or analyses in reaching his conclusions as to significant impacts on 80th Street. Neighborhood traffic impacts of the proposed project are fully discussed in the Subsequent Draft EIR Section IV.N.1, and the Traffic Study in Volume 2 of the Technical Appendices. See also Responses 25-4 and 31-7.

Comment 41-17:

GRADING

We feel that grading should be compatible with the Coastal Bluffs Specific Plan: "To protect, maintain enhance and where feasible, restore the overall quality of the coastal environment....."

and

"To regulate all development, including use, density, bulk and other factors in order to provide for the protection and enhancement of views**..... compatible and in character with the existing community.**"

We also feel that grading should be compatible with the California Coastal Act which states in part that its goals are to " protect, maintain and where feasible, enhance and restore the overall quality of the coastal zone environment..... The scenic visual qualities of coastal areas shall be considered and protected as a resource of public importance..... New development in highly scenic areas..... shall be subordinate to the character of its setting."

Response 41-17:

Please see Response 57-3 regarding the proposed project's compatibility with the Coastal Bluffs Specific Plan and the California Coastal Zone. Further, development proposed within the Coastal Zone boundary includes a portion of "A" Street and its associated grading, corrective grading along the bluff edge, revegetation of the bluff face and graded areas with native materials; and the Hastings Canyon fill. Grading along the bluff edge is intended to prevent erosion and divert drainage away from the bluff. The revegetation of the bluff face is intended to enhance and restore the overall quality of the coastal zone environment.

Comment 41-18:

The community is very concerned about the grading involved in the development of the West bluffs.

We are in support of the Friends of Ballona Wetlands in recommending a minimum 100 foot setback from the existing (finished) bluff top edge. This is more consistent with the development setback for the recent development at L.M.U. This would also ease the visual

impact that has been unsightly with recent bluff top developments. This would also allow for a more pleasing impact consistent with the wetlands development below. Any grading on the bluff top should be for restoration of revines [*sic*] and erosion control and to maintain the 100 foot setback from the existing bluff top edge or finished graded edge, whichever is greater **FOR ALL HOMES.**

Response 41-18:

The future homes on proposed Lots 1 through 27 will be setback from the proposed bluff edge between 45 to 90 feet, with an average setback of over 65 feet (this includes the required building setback on the lot). These setbacks have been determined to be adequate by the project geotechnical consultant and City of Los Angeles geotechnical staff. This setback is greater than other recent residential subdivisions (Tracts 43415 and 43416) constructed along the bluff as well as individual bluff top homes immediately southwest of the project site. The project geotechnical consultant and City geotechnical staff determined that from a geotechnical standpoint, no added setbacks are required on lots located above graded slopes laid back at a 2:1 gradient. These lots will still have a minimum rear yard setback of 15 feet. Proposed grading along the bluff top edge area is for repair of erosional features, erosion control and to provide a setback area. See also Response 35-4.

Comment 41-19:

Grading on top of the bluff is another area of concern for the community. Our position on bluff top grading is as follows:

1. From the crest of 80th Street east to Lincoln, grading should be limited to cutting the existing grade to a height equal to or less than the level on 80th. [*sic*] Street-Rayford Street. This position is reasonably consistent with the proposed grading by Catellus.

2. From the crest of 80th. [*sic*] Street west to Berger Ave., grading should be limited to the existing grade level or lower. The developer has planned to fill this area and raise some building pads perhaps as much as 15 feet or more. **Stated another way, building pads in this area should be on top of the existing grade and not above the existing grade. Any grading up in this area has a negative impact on views, view corridors, scenic impacts and other relevant environmental concerns to the community.**

Response 41-19:

The "crest" of 80th Street referred to in this comment is assumed to be the high point in this street between Park Hill Drive and Hastings Avenue. The elevation on the north side of 80th Street at this point is approximately 159 feet. All of the proposed project lots east of this point are at an elevation lower than this with the exception of the four last lots (Nos. 98-101) on Rayford Drive on the project's east end. Rayford Drive in this area rises to an existing elevation of 163 feet.

All of the proposed project lots west of the "crest" of 80th Street do not exceed the elevation (158 feet) of the north side of 80th Street at this point with the exception of Lots 73 and 74 located at the intersection 80th Street and Berger Avenue. 80th Street rises to an existing elevation of 172 feet at Berger Avenue. A majority of the proposed project lots west of the "crest" of 80th Street will be located on fill. The filling of this area is necessary to achieve positive drainage flow away from current problem areas such as 80th Street and Hastings Avenue, Hastings Canyon and the bluff edge. Proposed grading of the site is designed to have drainage flow towards "A" Street and into a storm drain system that flows down "A" Street into Lincoln Boulevard. The proposed filling and cutting of the site allows drainage from the western portions of the site to flow past the "crest" on 80th Street that extends into the site. Proposed Lots 64, 65, and 66 to be located on internal project "C" and "D" Streets are proposed in the October, 1998 plan to be located on fill as much as 7 feet higher than existing grade. This is necessary again for drainage purposes. These lots are proposed to be filled to an elevation of 142 feet which is still much lower than the "crest" on 80th Street (159 feet). The existing grade of the site currently rises to an elevation of 168 feet in the northwest corner of the site. This area is proposed to be cut down by as much as 20 feet. See also Response 40-2 for a discussion of project grades. Generally, all project lots in the revised plan are at the approximate same elevation or lower than the lots on 80th Street on a 90 degree tangent from 80th Street at any particular point.

Comment 41-20:

3. If anything, throughout this development, the developer should grade down from the existing grade more than up in order maintain the community's opportunity to view the ocean through the Hastings Canyon, the City, through the Hastings Ave and Park Hill corridors **and the mountain views enjoyed by everyone who lives in the community from the 80th-Berger-Rayford Street corridors.** This grading approach is more consistent with the

regulations and laws surrounding this development like the Coastal Bluffs Specific Plan and the California Coastal Act.

Response 41-20:

The object of grading the project site, is to prepare the site so that it meets with all the applicable provisions of the City of Los Angeles Building Code and Zoning Code, as well as seismic design criteria included within the Uniform Building Code. Ideally, a grading project should balance on site where the amount of cut is equal to the amount of fill. Otherwise the situation is created where required fill has to be imported onto the site or excess cut exported off the site (either way usually by truck). Although initially every attempt was made through the proposed project grading design to achieve a balanced site, the revised plan includes more cut than fill, resulting in a situation of having to export dirt off the site in an amount of approximately 250,000 cubic yards. Any further lowering of the project site through increased cut or reduced fill will increase the amount of export.

In addition, the Subsequent Draft EIR included analysis of reducing the site elevation (Section VI, Alternatives). With implementation of this alternative, the average elevation of the site would be lowered by approximately 20 feet in order to reduce the significant impacts to views associated with the proposed project. It was estimated that the dirt export off the site for this alternative would be approximately 883,000 cubic yards. However, it was determined that this would not be environmentally superior to the proposed project as this alternative would not reduce significant noise impacts associated with the proposed project and impacts associated with air quality (construction), plant and animal life, transportation and circulation, and paleontological resources would be greater. In addition to the adverse impacts that would be associated with increased grading and export, lowering the site would also mean lowering the bluff face in order to maintain the drainage objectives.

Please see Response 57-3 regarding the proposed project's compliance with the Coastal Bluffs Specific Plan and the California Coastal Act.

Comment 41-21:

CONSTRUCTION

The 1998 EIR has identified a number of negative impacts associated with the construction of the new homes.

Some of these negative impacts include noise and air quality.

The residents immediately impacted by the construction of West Bluffs are very concerned about living with these impacts for possibly 3 years of construction.

Every care should be taken to minimize the construction impacts to the residents of the community especially those most **immediately impacted living nearest to the project site.**

Construction mitigation measures should also include the following:

1. Until after the homes on 80th. [*sic*] Street are completed, no construction should be undertaken on Saturdays or Sundays. Weekday hours should be limited to hours between 7:00 a.m. and 4:30 p.m. during this same time period.

Response 41-21:

The Subsequent Draft EIR acknowledged the significant noise and air quality impacts associated with construction of the proposed project, and included mitigation to minimize these impacts to the extent possible. The suggested mitigation measure of restricting construction to weekday hours of 7:00 A.M. to 4:30 P.M. is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 41-22:

2. The community strongly supports the use of a constructions relations officer (pg. 14 of the EIR) to act as a community liaison concerning on-site construction activity, including resolution of issues related to fugitive dust control. The opportunity to contact this officer should be on a 24 hour basis. **The City should monitor the effectiveness of this program and mediate any differences.**

Response 41-22:

A 24-hour hotline would be provided by the project applicant during construction as part of the Applicant's Required Construction Practices (see Response 31-8). As included in the project Mitigation Monitoring Program, Appendix A of this Subsequent Final EIR, it is the responsibility of the Department of Building and Safety to enforce and monitor this mitigation measure.

Comment 41-23:

3. Because of the heavy construction vehicles using 80th-Rayford Streets and other surrounding streets, the community is very concerned about the potential damage to their properties due to this construction equipment. Perceived damage could include upset driveways, sidewalks, house foundations and walls etc. The developer should establish a program to ensure the adjacent property owners that any such damage would be repaired and restored.

Response 41-23:

The Subsequent Draft EIR included mitigation measures that require cleaning of paved streets if visible material has been carried onto adjacent streets (page 115). In addition, in response to community concerns, the applicant has agreed to additional grading practices requiring homes along 80th Street to be cleaned to mitigate dust related construction impacts. (See Section II, Corrections and Additions to the Subsequent Draft EIR, and Appendix B of this Subsequent Final EIR).

It is unlikely that residences along 80th and Rayford Streets would suffer property damage to driveways, sidewalks, or house foundations from project-related construction activities. A mitigation measure has been added stating that construction traffic would access the project site via "A" Street, whenever possible. (See Section II, Corrections and Additions to the Subsequent Draft EIR.) However, this comment will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 41-24:

RISK OF UPSET/HUMAN HEALTH

Page 15 of the EIR states in part ".... Because the construction related emission levels associated with the project are anticipated to result in a significant impact, a significant and unavoidable cumulative impact with respect to construction emissions would occur.... Operational emissions associated with the buildout of the project and related projects to be built and operational within the project's time frame would likely exceed SCAQMD thresholds for CO, ROC, and NOx. Cumulative air quality impacts would therefore be significant and unavoidable.

Page 84 or the EIR states "..... cumulative grading impacts (related to noise, haul routes, and air quality) would be significant." The impacts of dust created during the grading operations could also have significant negative impacts.

Response 41-24:

The Subsequent Draft EIR acknowledged that construction impacts would result in significant impacts with regard to air quality. Even with the addition of mitigation measures, some significant impacts would remain. However, these impacts would be short term and would cease after construction of the proposed project is completed. Please see Response 41-23 above regarding the addition of mitigation to offset dust impacts related to project construction. This comment will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 41-25:

Some children and older adults in the area of construction and especially across the street from the proposed development have been identified as having asthma, allergies, and respiratory problems which could be severely negatively impacted by the above related environmental factors.
The developer should make an effort to identify these individuals and propose a mitigation program ensure their health is not compromised. Additional efforts to maintain adjacent properties from the effects of dust and other pollutants needs to be undertaken.

More aggressive maintenance of these individual's homes and properties needs to be undertaken, especially more dust control, house and property cleaning, etc.

Attachments:
1. New Homes-vacant lot west of 80th street [*sic*] - Berger-P.D.R. Bluffs Area.
2. Map-Specific Plan Area of Edge Bluffs

Response 41-25:

As stated above in Response 41-24, the Subsequent Draft EIR acknowledged that construction impacts would result in significant short term impacts with regard to air quality, even with the implementation of mitigation measures. However, construction emissions were based upon the highest projected quarterly emissions occurring during demolition and site preparation. In

addition, assumptions included that construction equipment would be diesel-powered and operate simultaneously for up to nine hours per day and 27.5 days per month, which would represent a worst-case scenario as required for an air quality analysis. Actual construction activities are anticipated to result in fewer emissions than included as part of the EIR analysis. Therefore, no significant health hazard to adjacent residents related to air quality is anticipated.

After distribution of the Subsequent Draft EIR and in response to community concerns, the applicant agreed to clean adjacent homes that would be impacted by dust from construction activities, during the construction phase of the project. Please see Section II, Corrections and Additions to the Subsequent Draft EIR regarding this new mitigation measure.

LETTER NO. 42
Signed by: Steve and Elaine Kane

No Date

7452 W. 80th Street

E.I.R. No. 91-0675
West Bluffs Development-Tentative Tract No. 51122
Response and Position Statement for the West Bluffs

Comment 42-1:

Project Density

In the EIR the developer compares the density of the project to the old neighborhood to the south built many years ago and under different guidelines, laws and certainly not under the Coastal Bluffs Specific Plan nor the Coastal Act nor the Scenic Highway Plan.

The project density should be consistent with the density on similar developments following under the same guidelines. To be more specific, the U.C.L.A. homes were built in the Kentwood community. These homes were built on **20.5 acres.** The number of homes built on this land totaled 87 homes. This works out to be 4.25 homes per acre. The West Bluffs development is being built on 21.5 acres. Using the same density factor as the U.C.L.A. homes, the number of homes that should be built on the West Bluffs approximates 91 homes (4.25 X 21.5).

The current project density is 120 homes/21.5 acres = 5.58 homes per acre. This decrease in density allows for a more aesthetically pleasing impact from the area to the north and south of the project and is more in line with the Coastal Bluffs Specific Plan, the Scenic Highway Plan, the Coastal Act and established densities for comparable developments. The final EIR must address this issue and make a meaningful comparison and analysis.

Response 42-1:

The proposed project is located within the Westchester/Playa del Rey District Plan. Under the District Plan, the project site is primarily designated as Low Density Residential with a small

area adjacent to Lincoln Boulevard as Medium Density Residential. As stated in the Subsequent Draft EIR (page 203), based on the existing District Plan designations, the maximum density permitted is 353 dwelling units (based on 7 dwelling units per acre for 41.9 acres of the site and 24 dwelling units per acre for the remaining 2.5 acres of the site). Applying the Low Density Residential Designation of 7 dwelling units to the project site above the bluff top, the site would allow for up to 186 dwelling units (see also Response 35-13). As the proposed project is well under the allowable density, no significant impacts are anticipated.

Please see Response 57-3 regarding the proposed project's consistency with the Coastal Bluffs Specific Plan and the California Coastal Zone. Further, as stated in the Subsequent Draft EIR (pages 205 to 207), the proposed project would be consistent with the Scenic Highways Plan.

In addition, the Subsequent Draft EIR (Section VI, Alternatives) included a detailed analysis of a reduced density alternative, which would allow for the construction of 96 units. The Reduced Density Alternative was determined to be the environmentally superior alternative as it would generally reduce impacts associated with the proposed project and would contribute to the project objectives, although to a lesser extent. However, while this alternative would slightly reduce significant impacts associated with aesthetics and views, it would not result in the full elimination of significant impacts.

Comment 42-2:

The current proposed project, puts up a "wall" of homes on the bluff top that is deficient in view corridors, inconsistent with prior bluff top developments and aesthetically inconsistent with the recent impacts at L.M.U. that borders the project to the east.

Response 42-2:

As discussed in the Subsequent Draft EIR, development of the proposed project would result in significant impacts with regard to views from adjacent residences. Pedestrian trails and a view park have been included providing access to views that partially mitigate these view impacts. Please see Response 14-5 regarding modifications to the proposed project that provide enhanced viewing opportunities. However, the proposed project would not be inconsistent with the surrounding developments and would comply with all applicable plans and policies. The commentor's opinion will be forwarded to the decision makers for consideration in reviewing the project proposal.

Comment 42-3:

The City of Los Angeles should be consistent in applying the density ratio to this development as compared to other developments.

Response 42-3:

Every development project is different, and therefore has different density ratios. There is no requirement that the same density ratio be applied to every project or even to similar projects, but rather each project approved by the City must be consistent with the applicable District Plan. As stated in the Subsequent Draft EIR (page 203), the proposed project would be consistent with the Westchester/Playa del Rey District Plan. See also Response 42-1 regarding the proposed project's compliance with applicable land use plans and policies.

LETTER NO. 43
Signed by: Stephen J. Kane

June 13, 1998

7452 W. 80th St.
Westchester, CA 90045

Re: EIR 91-0675-sub (CDP) (PP) (ZBA) A.K.A. West Bluffs Site Location: 7400 block of 80th St. at Berger

Comment 43-1:

The residents on 80th St. and the community are formally requesting that a 30 day extension be granted to respond to the EIR for the West Bluffs development.

This request is based on the following circumstances:

--We have requested copies of the two volumes attached to the report and to date we have not received them.

--The original 1991 EIR that is the basis of the 1998 update has not been available to the community at any of the local libraries until just about a week ago. We have asked the local library for copies which they said where not available. Finally with our direction the library obtained a copy just about a week ago. This original 1991 EIR is critical for the community to read and understand as it relates to the 1998 update and the proposed development and many other related concerns, issues etc.

Response 43-1:

The June 1994 Final EIR was available for public review at the Department of City Planning, and was provided to the Loyola Village Library part way into the review period.

The two volumes attached to the Subsequent Draft EIR are the Technical Appendices. These volumes have been available for public review at the Department of City Planning and the Loyola Village Library.

Public review of the Draft EIR provides the City the opportunity to receive public input on the Draft EIR and the proposed project. The public review period for the West Bluffs Subsequent Draft EIR began on May 21, 1998 and officially ended on July 6, 1998, lasting two days beyond the required minimum 45-day review period. Comment letters were accepted and responded to in the Final EIR up to July 13, 1998, providing a total of 54 calendar days for public review and comment.

Comment 43-2:

--Many people on 80th St. and the surrounding community within 500 ft. of the project have come to me indicating that they have not been notified of the 1998 EIR. I have spent many hours of my time trying to deal with this problem.

Response 43-2:

There is no requirement under CEQA that residents living within 500 feet of a proposed project be noticed directly (e.g., by mail) regarding the availability of the Subsequent Draft EIR. For an explanation of the CEQA noticing requirements and of the review period for the West Bluffs Subsequent Draft EIR, see Response 16-4.

Comment 43-3:

--The response to the EIR is due by July 6, right after a Holiday weekend. With the community on vacation it seems very untimely and impossible to find the time on that weekend to formulate a response.

--Because of many of the circumstances I have highlighted above and considering that the month of June involves community graduations, vacations, etc., it leaves us with far less time than we need on such a huge number of pages to read, understand and respond to in an intelligent manner. **Please grant this request to the community.**

Your response would be greatly appreciated.

Response 43-3:

For an explanation of the public review period requirements under CEQA and the extended review period which was allowed for the West Bluffs Subsequent Draft EIR, see Response 16-4.

LETTER NO. 44
Signed by: Elaine Kane

July 3, 1998

7452 West 80th Street
Westchester, CA 90045

Comment 44-1:

According to the E.I.R. No. 910675 Human Health Risk Section, there is "no significant risk" to human health that will occur with the development of the land on Tentative Tract No. 5122 or West Bluffs (p. 74). We would like to respond to this statement and make Catellus aware of the potential harm that will occur among a select group of people who live next to the proposed development.

Our daughter, Jennifer, has been diagnosed with asthma since the age of three. Our son, Christopher, is also affected by the same malady. Jenny has undergone the recommended allergy testing and allergy shots. She is severely allergic to many trees, grasses and molds as well as **dust**. A change in her environment at home was necessary to decrease the amount of dust that might collect in her room. We encased her bed mattresses, box springs and pillows in special dust-proof zippered covers, tore up the carpeting, refinished the hard wood floors, and limited the number of "dust collectors" in her room. Jenny has required daily medication to control her symptoms since she was three. The allergy testing represented on the attached list does show a reduction in sensitivity to dust (1+) only after years of allergy shots which did not diminish her allergies to trees, grasses and molds. She has not outgrown her allergies. (See attached list of allergies and medications.)

Response 44-1:

See Response 41-25 regarding the potential air quality effects from construction activities.

Comment 44-2:

Additionally, the air pollution created during the construction period according to the EIR (page 116) would have **significant** and **unavoidable** short-term adverse impact on regional air quality.

We have scheduled an appointment with our allergist, Dr. Charles Song, for a complete evaluation on how to mitigate the adverse conditions in and around our home that will be created once grading & construction begins and continues on the West Bluffs. We strongly feel that our children's health will be affected by the excessive amount of "fugitive" dust and pollen from the vast amount of weeds and grasses generated during the grading of the project and during construction. The adverse impacts associated with the negative conditions related to air quality probably will have a similar negative impact on our children.

Response 44-2:

See Response 41-25 regarding the potential air quality effects from construction activities.

Comment 44-3:

At this time, mitigation measures offered by Catellus do not take into consideration the health of people sensitive to dust, weeds, and grasses. We take the position that measures should be granted **for those identified at risk**. House cleaning certificates for every 6 months or 2 x year will not make any significant difference in controlling Jenny's asthma which we are forced to treat daily. It will require more dust abatement plans than just watering down the project site. Mitigation measures should include 1) more frequent cleaning of homes, 2) washing down of neighboring sidewalks and driveways, and 3) room air cleaners or special window screens that filter out dirt, dust and even pollen. These additional measures will be necessary in order to manage the environment **of the people at risk**. Temporary relocation of some persons at risk should not be ruled out, but most likely be planned on.

Response 44-3:

See Response 41-25 regarding the potential air quality effects from construction activities and additional proposed mitigation measures with regard to dust impacts. The additional mitigation suggested in the comment regarding more frequent cleaning of homes, washing sidewalks and driveways, room cleaners and filters, and temporary relocation will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 44-4:

We pray that no individual's health is impacted in such a manner that their life is disrupted or adversely affected. We feel that knowledge and awareness of these facts before any problems occur is important in finding a solution that avoids potential problems, risks or injuries.

Your help, understanding, and cooperation in this matter would be greatly appreciated.

Response 44-4:

This comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

[Attachments not reproduced here: Medical receipts and records.]

LETTER NO. 45
Signed by: Robert Kinslow

July 6, 1998

[no address]

Subject: Comments on West Bluff project subsequent draft EIR: Number 91-0675

Comment 45-1:

With regard to Catellus Corporation's (applicants) West Bluff housing development permits, I strongly urge you to deny these permits. The coastal blufftop consists of 44 acres of endangered habitat values & is ecologically, biologically & physically in communication to the very fragile Ballona Wetlands. The West Bluff arguably is the most endangered place in Southern California. Several assessments show this land contains a vernal pool, coastal prairie, riparian canyon and two (2) Native American village sites. I urge you to deny the applicant's permits based on an inadequate and biased Draft Environmental Impact Report (DEIR). This blufftop is critical to the viable restoration of the Ballona Wetlands ecosystem. Indeed, it is an environmental opportunity to acquire, restore, & manage for biological diversity, abundance & viability the entire Ballona ecosystem-the kidneys of the Santa Monica bay.

Response 45-1:

Please refer to Responses 13-3, 13-4, 13-5 and 13-6 for discussion of the sensitivity of resources on the project site. Please refer to Response 15-9 for discussion of the significance of the archaeological sites and the absence of vernal pools from the project site. Please refer to Responses 22-3 and 34-5 for discussion of the resource value of Hastings Canyon. Please refer to Response 16-1 for a discussion of the lack of proposals and speculative nature of the alternative use of the site for the purpose of environmental restoration.

Comment 45-2:

The costs of the traffic increase due to this project are not adequately accounted for in the developer's studies. Applicants would have the neighborhood believe that they will benefit from the so-called mitigation measures they propose. In concert with the doubling of current

(175, 000 car trips per day) LAX traffic due to airport expansion plans, the 196, 000 car trips per day due to Playa Vista at full build-out & the proposed doubling of Marina del Rey capacity will result in a congested, gridlocked & polluted community. The offer of $350, 000 in stop signs and speed bumps and a few traffic barriers is not adequate.

Response 45-2:

The amount of $350,000 is targeted toward implementation of Phase I and Phase II of the Neighborhood Traffic Intrusion Program (NTIP) only, and includes such items as stop signs, speeds humps, traffic circles and other measures both internal to the neighborhood and along Manchester Avenue and Lincoln Boulevard. The effectiveness of the proposed program will be monitored to ensure its success. Further, intrusion by traffic from the projects noted onto the neighborhood streets affected by the NTIP program is expected to be nominal. However, estimates of neighborhood traffic volume growth are contained in Section IV.N.1 of the Subsequent Draft EIR. See Responses 8-4, 25-4, 38-2, and 41-16.

Comment 45-3:

There has been NO independent cost-benefit analysis comparing the true costs of the project with the projected benefits of this project. A proper cost-benefit analysis would put dollar estimates on the environmental and human costs imposed by this development, including at least the following:

1. smog and particulate air pollution;
2. traffic congestion:
3. greenhouse gases contributing to global warming;
4. loss of biodiversity;
5. loss of open space;
6. contamination of beaches by runoff;
7. loss of recreational & tourism values;
8. biological effects on the Santa Monica bay & benefits if not developed:
9. biological effects on the proposal to restore the Ballona wetlands;
10. loss of migratory fowl flyway:
11. loss of quality of life and consequent depression of surrounding property values;
12. risks associated with building in an earthquake and liquefaction zone; and,
13. loss of spiritual value to the indigenous Shoshone-Gabrieleno people.

Modern natural resource accounting techniques should be used, and all costs projected to account for the interests of at least seven (7) generations into the future. None of this has been done. (For accounting techniques, see Frank B. Cross, "Natural Resource Damage Valuation", 42 Vanderbilt Law Review 269 (1989).

Response 45-3:

The California Environmental Quality Act (CEQA) does not require an EIR to address economic impacts associated with a proposed project. Specifically the CEQA Guidelines state that "Economic or social information may be included in an EIR or *may* be presented in whatever form the agency desires" (*emphasis added*, CEQA Guidelines, Section 15131). Further, the Guidelines state that the "Economic and social effects of a project shall not be treated as significant effects on the environment" (Section 15131 (a)). The intent of CEQA is to evaluate and mitigate the physical impacts to the environment. There is no requirement to evaluate "dollar estimates on the environmental and human costs" as part of the environmental documentation.

The issues listed by the commentor are for the most part environmental and were discussed in the Subsequent Draft EIR (e.g., air quality, traffic, loss of open space, etc.). However, other issues listed (e.g., greenhouse gases, loss of recreational and tourism values, biological effect on the Santa Monica Bay) are outside the scope of this document. However, the comment will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 45-4:

Science has clearly shown that pollutants we put into the air end up in our water. These pollutants should also be considered in concert with surrounding proposed developments. "Approximately one-third of the pollutants entering the marine waters comes from air pollution that settles onto or washes into the oceans; much of this air pollution that pollutes the oceans is concentrated in the coastal zone." (Source: "Marine Pollution from Land-based Sources: Facts and Figures," United Nations Environment Programme, Industry and the Environment, 1992.)

Response 45-4:

The Subsequent Draft EIR acknowledged that significant cumulative air quality impacts would occur due to project-related construction and operation activities. However, the comment is

noted and will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 45-5:

The biological resources of this rare land cannot be over-stated. Developers own reports posit 67 species of birds, mammals and reptiles extant the site. The possibility of endangered species migrating from the Ballona Wetlands ecosystem is very high & usage of the uplands as foraging & as homes is well-documented in wetland-upland studies. The bluff top has a strong, native understory of dove lupine and annual deerweed, California suncup (cammissonia bistorta), datura, douglas' nightshade, plenty of coastal sage (artemisia Californica), cliff aster, turkey mullein, bedstraw, and cuddy leaf aster on the bluff top.

Response 45-5:

Please refer to Responses 13-3, 13-4, 13-5 and 13-6 for discussion of the sensitivity of resources on the project site. Please refer to Responses 34-4 and 34-5 for discussion of the presence of the wildflower species cited on the project site. The bluff slopes, which represent the highest quality habitat on the project site and which are directly adjacent to the Ballona Wetlands, are proposed for preservation and restoration as part of the project, benefitting species associated with the wetlands.

Comment 45-6:

Hastings Canyon is biologically viable. This canyon has developed as a corridor for wetland species to travel to the West blufftop. Indeed, the canyon contains willows, mulefat, coastal sage & California suncup, which are native wetland and upland plants. Please insist on truly independent biological studies.

Response 45-6:

Please refer to Response 22-3 regarding the biological resources of Hastings Canyon. With regard to the presence of wetland species on-site, as opposed to vernal pool species, please refer to Responses 15-9 and 34-5. Please refer to Responses 13-18 and 19-7 for discussion of the credibility of the biological resource surveys performed on the project site. Please refer to Response 19-9 for a discussion of the duration and timing of biological resource surveys performed.

Comment 45-7:

The developer's hired "scientists" deny the existence of vernal pond ecologies on the blufftop. As a knowledgeable wetland naturalist, I can personally attest to the existence of vernal ponding on the site. I have aerial photographs of such a pool & from the road have clearly witnessed kestrels, hawks & herons wading & foraging in vernal ponds. There is direct & incontrovertible evidence of depressions & potential vernal habitat on-site. If one researches geological surveys & biological history of the area, there is direct evidence that blufftop such as this one encourage vernal ponding. Further, the West Bluff contains two of the most endangered ecologies in Southern California: Prairie grasslands & vernal ponds. Finally, the developers own studies provide evidence of a "large sump" draining water into Hastings canyon [*sic*]. A sump is another descriptor for a natural ponding or a vernal pool.

Response 45-7:

Please refer to Response 15-9 for discussion of the absence of vernal pools from the project site. Speculative or known past or anticipated presence of a resource on the project site is beyond the scope of this EIR; please refer to Response 13-18 for discussion of the required scope of EIR analysis of environmental issues including biological resources, per CEQA.

The term "prairie grassland" as it is used by the commentor refers to the presence of predominantly non-native grasslands on coastal marine terraces. While *coastal terrace prairie* is a recognized, sensitive plant community, dominated by native perennial grasses, that is only known from Santa Cruz County north, its southern California counterpart is generally coastal sage scrub interspersed with non-native grassland. The bluff top prairie grassland referred to by the commentor is neither recognized nor a sensitive or protected community, comprising as it does on the project introduced grasses, ruderal specials and native and non-native wildflowers. No sensitive species were observed along the bluff top, likely as a result of regular discing for fire control. Thus, the bluff top does not constitute a sensitive or protected community.

Comment 45-8:

There are two Native American village sites on this blufftop, which make this land even more significant. The developer's "tabla rasa" approach to grade the village sites is a desecration of an entire culture. How comfortable would you be with a bulldozer desecrating your family gravesites & then having your loved ones displayed in a museum.

Response 45-8:

See Responses 34–8 and 37–3.

Comment 45-9:

Please consider these concerns with due diligence. This blufftop site is the last of its kind in the LA area. Its loss would be irreplaceable. Sara Wan of the coastal commission has stated that buffer areas of equal size to an area being considered for restoration are absolutely critical to the success of any wetland restoration. This blufftop must be considered in biological relationship with the Ballona Wetlands ecosystem. In fact, it is in intimate biological communication today. Finally, this project could be considered a taking of endangered species habitat according to the Federal Endangered Species Act.

Response 45-9:

Please refer to Response 13-1 for discussion of the relationship between Ballona Wetlands and the project site. As no formally listed endangered or threatened species are known to inhabit or utilize the project site and the project site does not, therefore, represent US Fish and Wildlife Service designated critical habitat, no takings under the Endangered Species Act would occur as a result of project implementation. Please refer to Responses 13-3, 13-4, 13-5 and 13-6 for discussion of the sensitivity of resources on the project site.

Comment 45-10:

Also, please put me on the notification list for permits involving this property which your agency is asked to issue, approve or concur.

Response 45-10:

The Department of City Planning will add the names and addresses of commentors to the mailing list for notification of public hearings concerning this project. However, this commentor has not provided an address. Individuals may contact the Department in writing to request that they be added to the notification list.

LETTER NO. 46
Signed by: Kathy Knight

July 7, 1998

1122 Oak Street
Santa Monica, CA 90405

Re: Draft EIR #91-0675-SUB (CDP) (PP) (ZBA)

Comment 46-1:

This letter is to confirm our conversation today that you will honor comments on the above draft EIR for at least another week, up to Monday July 13th. I am hoping very much that your director, Mr. Con How [*sic*] will extend the deadline 30 days as I and others have requested. I faxed him my request today.

If my understanding is not correct, please call me and let me know.

Thank you.

Response 46-1:

The public review period for the West Bluffs Subsequent Draft EIR began on May 21, 1998 and officially ended on July 6, 1998, lasting two days beyond the required minimum 45-day review period. Comment letters were accepted and responded to in the Final EIR up to July 13, 1998, providing a total of 54 calendar days for public review and comment. Please see Response 16-4 for further explanation of the public review and comment period.

LETTER NO. 47
Signed by: Sharon & Larry Lavenberg

July 3, 1998

7508 W. 80th Street
Los Angeles, CA

Comment 47-1:

We are residents of 80th Street and live directly across from the proposed development. For this reason, we have serious concerns about the way our lives and those of our neighbors will be affected. Here are the areas in which we are most concerned:

1) TRAFFIC

We are in favor of the Phase 1 traffic plan which has been developed by the community and Catellus over the last several months. We believe that the study of any Phase 2 traffic plan should not be started until at least one year after the occupancy of at least 75% of the homes on 80th street [*sic*] and after all of the Phase 1 improvements have been completed. This will give the community an opportunity to evaluate our additional needs. Phase 2 should be developed through dialogue between the community and Catellus as Phase 1 was. One important area to consider in Phase 2 is the intersection of Lincoln Blvd. and 83rd Street.

Response 47-1:

The concerns of the commentor are noted. See Responses 14-12, and 41-13.

Comment 47-2:

2) RECREATION AND PARK SPACE

We are in favor of the proposed park-like open space areas at Colegio, Park Hill, Hastings and 79th Streets, as well as the small parks planned inside the development. We feel that there is a real need for open space in this area and would welcome any additional open space inside the development.

One thing that is sorely missing is a pedestrian path around the development which would also give the community access to the wetlands. The West Bluff development overlooks the Ballona Wetlands, Marina del Rey, Santa Monica Bay and the Pacific Ocean. This entire community has enjoyed these spectacular views for years and is losing quite a lot by the development of this large parcel of land. One consolation would be the ability to enjoy these views using a pedestrian path around the development.

Response 47-2:

Comment noted. After distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan to include additional open space and a reconfiguration of the pedestrian trail. Reconfiguration of the pedestrian trail would allow greater public access to views of Ballona Wetlands and beyond. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of the proposed modifications regarding additional open space and reconfiguration of the pedestrian trail.

Comment 47-3:

3) GRADING

We are very concerned about the grading on top of the bluff. We believe that wherever possible, grading should be done with the idea of preserving views for the existing neighborhood.

Response 47-3:

The project's proposed grading design has been done with the idea of minimizing grading for a subdivision development of this type, filling Hastings Canyon, diverting drainage away from problem areas (such as Hastings Canyon, the bluff edge and the area around 80th Street and Hastings Avenue) and maintaining adequate drainage flow. No attempt has been made in the grading design to obstruct views other than what would normally occur by single family residential development on vacant existing R1-1 zoned land. All proposed internal streets of the project have been kept at the minimum grade (0.5-1.0 percent) necessary to maintain adequate drainage flow. None of the proposed streets or the adjoining project lots have been unduly raised with the idea of increasing views from project lots at the expense of views from

the existing neighborhood. Some of the existing higher areas of the site located in the areas of proposed Lots 1-35, 89-91, and 127 are proposed to be lowered.

Other design features have been incorporated into the proposed plan with the idea of providing views for the existing neighborhood. These include limiting the number of proposed homes on 80th Street and Rayford Drive, providing 100 foot wide open space lots on 80th Street (Lots 127 and 128) and on Berger Avenue (Lots 120 and 130), and proposing a public walkway system through the project to the bluff top for viewing opportunities there.

Comment 47-4:

4) AESTHETICS AND VIEWS

Since this large parcel of land is one of the last remaining vestiges of open space and spectacular views in the city, we feel that the developer has a special duty to design his development with the protection of views for the community as a primary concern. The development should be aesthetically pleasing to the surrounding neighborhood as well as to viewers below the bluffs.

We believe more should be done with the planned buildings on 80th Street to minimize the negative impacts associated with the aesthetics and views. This could be done through wider side yards between homes, building designs and elevations, smaller buildings, and architectural designs that would allow for greater view corridors and view opportunities for the community.

Response 47-4:

Please see Responses 13-7 and 31-4 regarding changes to the Tentative Tract Map and width of side yards, and Response 14-5 regarding views. The comment will be forwarded to the decision makers for consideration in reviewing the project proposal.

Comment 47-5:

5) CONSTRUCTION MITIGATION

We are very concerned about our "quality of life" during the lengthy building process. We are strongly in favor of a vermin abatement program being provided by the

developer. We also want assurances that any damage to our homes or property will be repaired immediately. There should be a 24 hour hotline available so that we can express any complaints that we may have.

Response 47-5:

A project mitigation measure has been added, requiring adherence to the Applicant's Required Construction Practices, consistent with discussions between the applicant and the community. (See Section II, Corrections and Additions to the Subsequent Draft EIR). This includes a 24-hour hotline as stated in Response 31-8.

Comment 47-6:

These are the major concerns that we, as residents of 80th Street, have regarding the proposed West Bluffs development. As much as we hate to lose the spectacular view and open space that we have enjoyed for many years, we realize that this is private property and Catellus, as owner of the property has a right to build. However, we sincerely hope that they will take into account the needs and feelings of the residents of this community as they proceed with their development. We are prepared to welcome our new, neighbors into this beautiful area.

Response 47-6:

This comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

LETTER NO. 48
Signed by: Bodo Lemke

June 23, 1998

7501 W. 85th Street
Playa del Rey, CA 90293

RE:97111005 WEST BLUFFS

Comment 48-1:

As a neighbor of the proposed West Bluffs Development, I want to commend the developer for his commitment to mitigate existing traffic problems in the community. In particular, I am pleased that Hastings Avenue will not be extended and become a shortcut to Lincoln Blvd.

I commend Mr. Lauener for working with the community to create a traffic improvement plan which protects our neighborhoods from the historic intrusion of drivers seeking the fastest route to their destination.

I urge you to join me in supporting the West Bluffs Development. I believe this project and the traffic mitigation program will enhance the community and our quality of life.

Response 48-1:

The comment is acknowledged and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 49
Signed By: Mrs. Clay W. Lowrey

July 6, 1998

8045 Rayford Drive
Los Angeles, CA 90045

Comment 49-1:

This letter is in response to the proposed West Bluff project. I would like to make the following points:

1. I am a longtime resident and home owner, since Feb. 1954. I also own apartment buildings in the area so have a financial interest as well.

2. I have a commanding view-from the "Hollywood" sign to Santa Monica Bay-which will be completely lost to me. My property value will lessen because of lost view. The proposed homes immediately facing and across the street are to be of lesser value than the rest of the project. Those homes will command a much larger price due to the view-taken from us. Not quite fair.

Response 49-1:

Please see Response 25-7 regarding the economic value of the proposed homes. The comment will be forwarded to the decision makers for consideration in reviewing the project proposal.

Comment 49-2:

3. Traffic in the vicinity as well as on Lincoln Blvd will increase substantially, especially in addition to the proposed Playa Vista project.

Response 49-2:

The commentor's opinion is noted. Future traffic conditions on Lincoln Boulevard and throughout the study area are described in Section IV.N.1 of the Subsequent Draft EIR. No significant project impacts to traffic are projected.

Comment 49-3:

4. Ruth Gallanter in her May 6, 1992 letter to the City Planning Dept. stated "the site potentially provides significant public views of the Pacific Ocean, the Ballona Wetlands and the Westside of L.A. The project should be designed to include and encourage public viewing areas... this site lies in a community both statistically and realistically short of recreational open space. If the City is going to consider approval of a subdivision on this site, we have an obligation to maximize public amenities and environmental protections while minimizing impacts on the surrounding community. I urge the Dept. to pursue these goals vigorously." I hope and trust her wishes are being incorporated in the project.

I realize one can not stop progress (?) and business ventures, but I hope some actual concrete consideration will be given home owners in the area.

Response 49-3:

It should be noted that the letter quoted from Councilwoman Galanter (dated May 6, 1992) is in regard to the previously proposed project, However, as stated in the Subsequent Draft EIR, the proposed project includes the provision of dedicated public open space and recreational areas. Further, after distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan to include additional open space and reconfiguration of the pedestrian trail. Reconfiguration of the pedestrian trail would allow greater public access to views of Ballona Wetlands and beyond. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of the proposed modifications regarding additional open space and reconfiguration of the pedestrian trail. The comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

LETTER NO. 50
Signed by: Dale Neumen

July 3, 1998

7546 W. 80th St.
Los Angeles, Ca 90045

Comment 50-1:

Reference is made to the E.I.R. No91-0675 [*sic*] concerning the West Bluffs Development. The following comments are submitted.

Alternatives

In able to satisfy the courts after 20 years of litigation, the State of California reduced the total number of lanes (4 to 3) per roadway (Rt105).

Response 50-1:

This comment regarding Route 105 is noted for the record, however Route 105 is outside the project study area.

Comment 50-2:

A reduction of the number of homes being built by 25% would result in 90 homes or less for this development. Also the homes should be limited to one story in height, this is a present ht. limit by the City of Beverly Hills. The spacing of homes could be planned to give an unobstructed view(between the homes) from 80th St. to the bluffs. The single story homes would be compatible with most of the homes on 80th St. This would improve the Aesthetics of the proposed development and not completely restrict the view from 80th St.

Grading

Reference to Figure 51 Cross Section Index Section CC (which shows lots 76, 62, 40, 32,and 22) on Figure 53 on cross section C. The cross section indicates a fill pad of about 15 feet over the existing groundprior [*sic*] to the construction of homes in the vicinty [*sic*] of lot 62. This is not protecting the existing quality of the coastal environment per the Coastal Bluff

Specific Plan. This is not compatable [*sic*] to the existing community--homes not built on fill.The [*sic*] proposed fill would further restrict the view from existing homes along 80th St. In accordance to the Calif Coastal Act any new development in highly scenic areas shall be subordinated to the character of its setting. This would also apply to any fill on the bluff. Why not step grade by excavating the existing land and leave some undobstructed [*sic*] views from 80th St.Hughes [*sic*] did this when they built their office building on the east side of Lincoln Blvd. They complied with the aesthetics and did not obstruct the views from existing homes the way Cattelus [*sic*] proposes to do. The grading should be compatible with existing home sites along 80th St.

Response 50-2:

A Reduced Density Alternative (No. 4) was analyzed in Section VI, Alternatives, of the Subsequent Draft EIR. This alternative would result in slightly reduced impacts as compared to the proposed project, but would not result in the elimination of significant impacts.

The only lots in Cross Section C (Figure 53 on page 357 of the Subsequent Draft EIR) that are in a fill situation, pursuant to the October 1998 revised Tentative Tract Map, are Lots 77 (formerly Lot 76) and 62. Lots 62 and adjacent Lot 63 are proposed to be filled approximately 5 feet above existing grade. Lots 22, 32 and 41 are in a cut situation. The proposed new elevation of Lot 22 (146 feet) is cut as much as 20 feet lower than the existing grade (166 feet). In the line of sight (viewshed) that could be made along Cross Section CC the impacts on views would be negligible because the raising of Lot 62 to 143 feet is offset by the lowering of Lot 22 to a similar elevation.

The Subsequent Draft EIR notes that the quality coastal environment involving sensitive plant and animal habitat is more on the bluff face area or Subarea 3 of the Coastal Bluffs Specific Plan than on the bluff top area or Subarea 2 of the Specific Plan. One of the main factors in the project's grading design is to facilitate positive drainage flow away from problem areas. In order to achieve this using a very simplified description, low spots need to be filled and high spots lowered. The fill areas in question are outside of the adopted California Coastal Zone. The Coastal Zone covers mainly only the bluff face area of the project site.

Step grading the site would significantly lower the bluff face. This impact to the bluff face would be inconsistent with the purposes of the City of Los Angeles Coastal Bluffs Specific Plan and the California Coastal Act. Further, the Subsequent Draft EIR included analysis of reducing the site elevation (Section VI, Alternatives). With implementation of this alternative,

the average elevation of the site would be lowered by approximately 20 feet in order to reduce significant impacts to views associated with the proposed project. However, it was determined that this would not be environmentally superior to the proposed project as this alternative would not reduce significant noise impacts associated with the proposed projects and impacts associated with air quality (construction), plant and animal life, transportation and circulation, and paleontological resources would be greater.

The Hughes office building on the east side of Lincoln Boulevard is not within either the Coastal Bluffs Specific Plan area or the California Coastal Zone, therefore this development was not subject to the regulations of these documents that could have restricted its ability to cut into the bluff face.

Comment 50-3:

The filling of Hastings Canyon is under City jurisdiction--this is a deicated [*sic*] public right of wayand [*sic*] lies within the Coastal Zone. To change anything here should require a public hearing, so filling of Hastings Canyon would not be allowed. The project is not in compliance with the California Coastal Act and the Coastal Bluff Specific Plan as it does not protect the enhancement of views. No change should be granted in the boundary of the Coastal Zone.

Response 50-3:

The entire project site is under the jurisdiction of the City of Los Angeles. Hastings Canyon (the westerly portion) is partially within the Coastal Zone. Consideration of Tentative Tract Map No. 51122 by the City, which includes the proposal to fill Hastings Canyon, requires a public hearing. Further, the project requires a Coastal Development Permit and a minor Costal Zone boundary adjustment, to be issued by the California Coastal Commission. These proposed activities will also require public hearings. All required public hearings will be held to meet Agency requirements.

Comment 50-4:

*//Traffic

As previously stated in my letter to you on Nov.27,1997 traffic in the future will be grid locked on Lincoln Blvd with the Playa Vista Development and the expansion at LAX. Why add more traffic to Lincoln Blvd.

Response 50-4:

Traffic impacts are described in Section IV.N.1 of the Subsequent Draft EIR, and included future traffic conditions on Lincoln Boulevard and throughout the study area. The project traffic study, which was approved by LADOT incorporated into the Subsequent Draft EIR, found no significant project impacts to area roadways.

Comment 50-5:

Recreational and Park Space
The amount of land set aside for park is below standard for a tract of ths [*sic*] size. Also the pubic [*sic*] should have unlimited acess [*sic*] to a foot path along the top of the entire bluff to afford the view from the bluff.

Response 50-5:

The Subsequent Draft EIR indicated that approximately 16.75 acres of open space would be included as part of the project. After distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan to include additional dedicated open space and a reconfiguration of the pedestrian trail. As stated in Response 13-7, the modified site plan includes 17.33 acres of open space, of which 1.96 acres would be dedicated as recreation/park use. As discussed in the Subsequent Draft EIR (page 290), the park requirements as established by Section 17.12 of the Municipal Code is 2.1 acres. Although the proposed changes increase the amount of dedicated park land, it is less than that which is required. Therefore, if the proposed project is approved, the decision makers may require additional land dedication, the provision of private park space for residents or the payment of in-lieu fees as mitigation.

Reconfiguration of the pedestrian trail would allow greater public access to views of Ballona Wetlands and beyond. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of changes regarding the pedestrian trail and the additional open space as proposed under the modified site plan.

Comment 50-6:

Construction

The hours of construction should be limited to 8;[*sic*] a.m. and 5:[*sic*] p.m. Monday thru [*sic*] Friday with no work on weekends [*sic*] The first order of work would be to grade an access road to Lincoln Blvd. [*sic*] at the location of the proposed entrance to Lincoln Blvd. This would reduce traffic on the existing streets by having all Construction [*sic*] traffic entering and leaving the project by the way of Lincoln Blvd. After completing the access road work should start on the reconstruction of 80th. [*sic*] St. and Rayford Drive and competing [*sic*] this work as soon as possible. The houses will be built in phases so it would be in the best interest of the community to start and complete the houses along 80th St. and Rayford Drive prior to any other houses. This would reduce the noise and dust when the other phases are under construction.

Response 50-6:

The Subsequent Draft EIR (page 174) included mitigation restricting the hours for construction work to reduce associated impacts. The suggested mitigation by the commentor to further restrict construction hours is noted and will be referred to the decision makers for consideration in reviewing the project proposal. Further, to help reduce construction impacts, a new mitigation measure has been added to enforce construction practices which reduce impacts. Also, a mitigation measure has been added requiring construction access to occur via "A" Street whenever possible. See Section II, Corrections and Additions to the Subsequent Draft EIR.

The grading of proposed "A" Street, the access from Lincoln Boulevard, would have to be from the top down. It is not feasible to start grading in a cut situation from the bottom up. The dirt to be cut from the "A" Street area would then need to be deposited in proposed fill areas on the site.

Comment 50-7:

General

It is the duty of the City, County, State and Federal agencies to preserve this open space, as once it is lost it is gone forever. The future generations will have nothing to see but houses on this site, if nothing is done now to preserve it.

Response 50-7:

The commentor's opinion regarding the proposed project and concerns for preserving the open space are acknowledged and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 51
Signed by: Denise O'Brien-Gunnell

June 22, 1998

8035 Nardian Way
Los Angeles, CA 90045

Comment 51-1:

I am writing to express my support for the proposed West Bluffs development. After reviewing the Environmental Impact Report, I believe the Catellus Residential Group is to be commended for their efforts to engage the community in a productive dialogue with respect to the project's impacts.

As a 15 year resident of Westchester, I am aware that this undeveloped parcel has been targeted for development for at least the last decade. I am pleased the Catellus Residential Group, a premier residential developer, will be adding to the single family housing inventory in our community. My husband and I have been looking for a newer, larger home in Westchester/Playa del Rey for over four years.

I speak for many of my friends and neighbors when I say we eagerly await the development of the West Bluffs homes and hope to live there one day soon. Our families are growing and our needs are rapidly changing. We love the Westchester community and all of its amenities and would like to remain living here to raise our families. The new West Bluff homes will fit our lifestyle needs and allows us to remain active and involved in this community.

I urge you to approve the Catellus Residential Group's West Bluffs development as soon as possible.

Response 51-1:

The comment is acknowledged and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 52
Signed by: Stavros & Anne-Marie Olympios

8017 Rayford Drive
Los Angeles, CA 90045-2424

Reference: West Bluffs ETR#91-0675

Comment 52-1:

We have been residing at 8017 Rayford Drive for almost thirty years.

Rayford Drive along with 80th Street faces the referenced development project. We have found the location very desirable to live environmentally and most of all we enjoyed the great views from our 2nd floor.

It seems that the above is just history as the developer's intention is to maximize his ROR at the expense of the neighborhood.

Response 52-1:

These comments will be forwarded to the decision makers for their consideration. See Responses 52-2 through 52-5.

Comment 52-2:

The following comments, concerns and recommendations are offered for your consideration.

The current project as proposed with 30' max. height definitely is going to eliminate our views with significant impact on the values of our homes. The developer should ensure that through density reduction and or reduced site elevation minimize the impact on the views for the neighborhood facing the project.

Response 52-2:

Please see Response 25-7 regarding views and the economic value of homes. The comment will be forwarded to the decision makers for consideration in reviewing the project proposal.

Comment 52-3:

The neighborhood in view of the additional built-up, 230 more homes in the last few years is really lacking of recreational and park space. The development of property on top of Hastings Canyon provides Catellus with huge economic benefits with very little rewards for the tax payer. It seems that the developer would have so much to gain.

Response 52-3:

As stated in the Subsequent Draft EIR, the proposed project includes the provisions for public open space and recreational areas. Further, after distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan to include additional open space and reconfiguration of the pedestrian trail. Reconfiguration of the pedestrian trail would allow greater public access to views of Ballona Wetlands and beyond. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of the proposed modifications regarding additional open space and reconfiguration of the pedestrian trail.

The comment regarding the economic gain for the applicant is not relevant to address as part of the environmental process. However, this comment will be forwarded to the decision makers for consideration in reviewing the project proposal.

Comment 52-4:

The traffic issue is rather major having attended all the meetings of the developer and the presentation of the traffic engineer I came to the conclusion that the traffic mitigation solutions are equivalent to Band-Aids to a major traffic problem on Lincoln Boulevard [*sic*] It is a major problem now without any additional traffic from the project or future expansion at LAX.. [*sic*]

My prediction is that Lincoln Blvd. will resemble the San Diego Fwy (parking lot).

Response 52-4:

Traffic impacts are described in Section IV.N.1 of the Subsequent Draft EIR, and included future traffic conditions on Lincoln Boulevard and throughout the study area. The project traffic study, which is approved by LADOT and incorporated into the Subsequent Draft EIR, found no significant project impacts to area roadways.

Comment 52-5:

Certainly I do not want to take your time and present you with a "Thesis" on the project if there is no other alternative but the project to go ahead Alternative 3-Reduced Site Elevation and Alternative 4-Reduced Density are far more desirable.

Response 52-5:

As stated in the Subsequent Draft EIR (Section VI, Alternatives), implementation of the Reduced Site Elevation Alternative would result in the average elevation of the site being lowered by approximately 20 feet. This would reduce the significant impacts to views associated with the proposed project. However, it was determined that this would not be environmentally superior to the proposed project as this alternative would not reduce significant noise impacts associated with the proposed project and impacts associated with air quality (construction), plant and animal life, transportation and circulation, and paleontological resources would be greater. Further, this alternative would not meet all of the project objectives.

The Reduced Density Alternative was determined to be the environmentally superior alternative as it would generally reduce impacts associated with the proposed project and would contribute to the project objectives, although to a lesser extent. However, while this alternative would slightly reduce significant impacts associated with aesthetics and views, it would not result in the full elimination of significant impacts.

The proposed comment regarding selection of the Reduced Site Elevation Alternative or the Reduced Density Alternative is noted. This comment will be forwarded to the decision makers in consideration in reviewing the project proposal.

LETTER NO. 53
Signed by: Marit A. Powell

July 2, 1998

7371 West 81st Street
Los Angeles, CA 90045

Comment 53-1:

I have reviewed the Environment Impact Report from the City of Los Angeles regarding the West Bluffs development.

My concern is that we need a minimum of three acres of open and recreational space on the West Bluff development as recommended by the West Bluff Steering Committee.

I strongly urge the Department of City Planning to implement this recommendation, not only for benefit of the development itself, but also for the benefit of the community surrounding the West Bluff development.

Thank you for your consideration of this recommendation.

Response 53-1:

As stated in the subsequent Draft EIR, the proposed project includes the provision of public open space and recreational areas. The Subsequent Draft EIR indicated that approximately 16.75 acres of open space would be included as part of the project. Further, after distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan to include additional dedicated open space and a reconfiguration of the pedestrian trail. The modified site plan includes 17.33 acres of open space, of which 1.96 acres would be dedicated as recreation/park use. As discussed in the Subsequent Draft EIR (page 290), the park requirements as established by Section 17.12 of the Municipal Code is 2.1 acres. Although the proposed changes increase the amount of dedicated park land, it is less than that which is required. Therefore, if the project is approved, the decision makers may require additional land dedication, the provision of private park space for residents, or the payment of in-lieu fees as mitigation. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 13-7 for a more detailed

description of the proposed modifications regarding open space. However, this comment will be forwarded to the decision makers in consideration in reviewing the project proposal.

LETTER NO. 54
Signed by: George Prengaman

July 6, 1998

7700 W. 83rd Street
Playa del Rey, CA 90293

Comment 54-1:

This letter is a response to the Draft Environmental Impact Report for the West Bluffs Project, EIR No.91-0675, State Clearinghouse No. 92014046. I am a 25 year resident of Westchester and Playa Del Rey, and my family and I live on 83rd St., approximately 2 blocks away from the proposed development.

I have been an active participant in the West Bluffs Steering Committee, comprised of many residents of our community, and I endorse their collective comments as represented in a letter from Craig Eggers to you dated July 6,1998. My individual comments on the various topics of the EIR are described below by topic. I would also like to acknowledge the involvement and the cooperation of the developer ([*sic*] Catellus and Hughes) in discussing and working with the community representatives, especially with the West Bluffs Steering Committee.[*sic*]

Response 54-1:

This comment is an introductory paragraph to the commentor's letter and does not require a separate response.

Comment 54-2:

TRAFFIC

I believe that it is imperative that funds be set aside for improvements as [*sic*] the corner of 83rd St. and Lincoln Blvd. I support the inclusion of speed bumps on 83rd St, and I encourage the reevaluation of traffic controls on 80th St. In the final weeks before the Steering Committee completed its work with the developer, two speed bumps on 80th St. were deleted. As a long-time resident of this area, I firmly believe that the traffic situation on 80th St. is probably the most dangerous area in Westchester and that speed bumps or some other traffic mitigation

measure is desperately needed before some sort of tragedy occurs. I also feel that the additional traffic generated by the homes on 80th St. will result in a cumulative impact that exceeds the significant threshold established by the City and that a mitigation is required.

Response 54-2:

Traffic impacts are described in Section IV.N.1 of the Subsequent Draft EIR. The project traffic study, which is approved by LADOT and incorporated into the Subsequent Draft EIR, found no significant project impacts to area roadways. See also Responses 14-12, 14-13, 25-4, 31-7, 35-12, 38-2, and 41-16.

Comment 54-3:

AESTHETICS

The loss of significant views for a large community should be replaced with a series of view parks connected by a trail around the development, as discussed by the Steering Committee. In addition, at each street that meets 80th St., there should be a minimum of 100' set aside for use as emergency access and **usable, active recreation space.**

The proposed Pedestrian trail overlooks Lincoln Blvd. and is in precisely the wrong location. Instead the trail should provide views of the ocean and the Santa Monica area.

Response 54-3:

After distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan. Modifications include additional open space and reconfiguration of the pedestrian trail, which would allow for greater public access to views of Ballona Wetlands and beyond. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of the proposed modifications regarding additional open space and reconfiguration of the pedestrian trail. Also, two open space lots (Lots 127 and 128), 100 feet minimum in width are incorporated with the project on 80th Street just north of Park Hill Drive and Hasting's Avenue (see Response 14-3). The comment regarding the minimum set aside is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 54-4:

My strongest comment and belief about open space is that the City of Los Angeles' actions in ceding land to the developer to fill in Hastings Canyon and thereby gain many extremely valuable building lots with prime views, should not occur without a **significant** dedication of active open space for connection with the existing community. Such park areas when connected with a bluff trail as discussed above would provide just compensation for the new land created by the filling of the Hastings Canyon area.

Response 54-4:

The majority of Hastings Canyon is owned by the applicant. Only a portion of the area, which was designated as Veragua Walk and Hastings Avenue, is a public right-of-way. As an offset to abandoning the existing Veragua Walk and Hastings Avenue right-of-way (totaling 0.8 acres), the applicant proposes to dedicate and improve 6.29 acres of public streets with sidewalks. In addition, the project proposes to dedicate over 2,500 linear feet of public walkway outside of the street right-of-ways, as compared to the 110 linear feet of existing Veragua Walk right-of-way on the project site. The existing Hastings Avenue and Veragua Walk right-of-way on the project site has never received any improvement for public use.

See Responses 54-3 and 31-6 regarding open space and the pedestrian trail.

Comment 54-5:

GRADING

I strongly recommend that a minimum of 100 feet be established as the setback from the existing bluff top edge. Grading of the bluff areas should be restricted to erosion control and restoration purposes only. Also, building pads in the development should not be artificially raised up in such a way or to such a height that they unnecessarily disrupt view corridors. These grading changes would result in a project that is much more in keeping with the California Coastal Act.

Response 54-5:

The future homes on project Lots 1 through 27 are proposed to be setback from the proposed bluff edge between 45 and 90 feet with an average setback of over 65 feet (this includes the

required rear yard building setbacks on the lots). Grading in the portion of the bluff top setback area outside of the residential lot areas, which extends 30 to 75 feet back from the bluff edge, and grading on the bluff face will be limited mainly to erosion control and restoration purposes. The exceptions to this are the Hastings Canyon fill which does serve an erosion control purpose, the "A" Street cut, and proposed bluff top public walkways and viewing areas. Building pads have been raised where necessary only the minimum amount in order to provide positive drainage flow. The residential development area of the proposed project is for the most part outside of the California Coastal Zone as adopted.

Comment 54-6:

Insofar as construction grading is concerned, the developer should be charged with creating an effective program to relieve nearby residents from damage or dust problems.

Response 54-6:

To reduce construction impacts, a mitigation measure enforcing the Applicant's Required Construction Practices for the West Bluffs Project has been added. See Section II, Corrections and Additions to the Subsequent Draft EIR, and Appendix B of this Subsequent Final EIR.

Comment 54-7:

OVERALL

My strongest feeling about this development is that there should be park areas created to serve the entire community and that this development represents the final opportunity to achieve this goal. In 1992, Ms. Ruth Galantar [*sic*] went on record supporting this park issue and it is now time for this to be realized.

Response 54-7:

The commentor's opinion is noted for the record and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 55
Signed by: Chris Rembert

July 3, 1998

7433 w81st street

Subject: West Bluffs Project, Subsequent Draft Environmental Impact Report, EIR No. 91-0675, State Clearinghouse No.92014046

Comment 55-1:

As a member of the West Bluffs Steering Committee, I am submitting the following concerns of the residents on 81st street as well as myself.

The Process

On a landscape where giant corporations continue to swallow up what few open spaces of land are left like giant discount stores once swallowed up five-and-dime stores, we as communities become frustrated.

We have questions, but the City is not around to answer them. We have complaints and concerns about the project, but there is nobody to listen. Who does the City represent, The Community or the Giant Corporations?

It is our understanding that the West Bluffs project cannot be started until all of the city agencies have given their approval, and the city agencies cannot do this until all questions raising from the EIR have been answered. **If this process is correct than why were there surveyors on the project last week marking the bounder [*sic*] lines for the new homes on 80th street.**

Response 55-1:

Field work was performed to confirm the property's existing boundary, topography, and the conditions of the bluff's edge. The applicant, Catellus Residential Group, is now the legal property owner and within their rights to perform these surveys. Construction of the proposed project would not begin until all necessary approvals and permits have been obtained. By

submitting this comment letter, the commentor's concerns regarding the proposed project will be reviewed by the City for their consideration of the project proposal.

Comment 55-2:

Grading of the Project and Building Height Requirements

The grading and building height requirements for the West Bluffs Project falls under the Coastal Bluffs Specific Plan. The goals of this regulation are: (see page 353 of the EIR Report)

> *To regulate a development in order to provide for the protection and enhancement of views of scenic features visible from scenic corridors, and to assure that development is compatible and in character with the existing community.

Where as the building heights for the proposed project stated within the EIR report are within the height restrictions within existing community, the proposed grading levels are not.

The building heights for the existing community are determined from existing grade and in the proposed project the building heights are going to be determined from an artificially created level. A level which in some areas will be 15' above the existing grade which the existing community is being held too [*sic*].

Response 55-2:

The object of grading is to prepare the proposed project site to meet all the applicable provisions of the City of Los Angeles Building Code and Zoning Code, as well as seismic design criteria included within the Uniform Building Code. As a result of grading, changes in topography would range in elevation from 1 to 7 feet in areas of fill (with the exception of Hastings Canyon) and 1 to 20 feet in areas of cut. The largest change associated with filling would be in Hastings Canyon (maximum 80 feet fill-approximately) and correction of erosional features on the site (see Subsequent Draft EIR, Figure 52, Cross Sections A & B, page 356). Further, grading of the project site would, in some areas, result in lower elevations than currently exist. See also Response 40-2 for further detail regarding this issue.

Comment 55-3:

If the proposed grade levels are allowed to stay as is then the proposed project will no longer be compatible and in character with the existing community. This will also be in direct contradiction with the Coastal Bluffs Specific Plan.

On page 358 the EIR report states that the project would create lesser impacts for multi-story homes on 80th street [*sic*] with view windows at/or higher than elevations within the project site. We question this statement and pose the following question? [*sic*] Will any current or future re-modeled multi-story homes on 80th or 81st street [*sic*] have views of the ocean or mountains after this project is built.[*sic*] With the proposed grade levels you will have 45' tall homes above existing grade in the project across from 33' tall homes on 80th and 81st street. [*sic*]

Response 55-3:

As stated in the Subsequent Draft EIR (page 204), the proposed project would be developed in accordance with all applicable regulations of the Coastal Bluffs Specific Plan. The proposed residential structures would be located within Subarea 2 of the Specific Plan, which does not set additional development restrictions. The proposed project would need to comply with the Specific Plan's regulations for submittal of a soils and geology report (see page 82).

The proposed building heights for the homes on the project site would range from 29 to 32 feet. No 45-foot high homes are proposed. The 45-foot height of proposed homes mentioned in the comment is believed to refer to a 30-foot home on a 15-foot fill. However, the existing grade for areas of the 15-foot fills is lower than 80th Street, Rexford Drive and 81st Street. Further, a mitigation measure has been included since distribution of the Subsequent Draft EIR to ensure building heights would not exceed 35 feet (see Section II, Corrections and Additions to the Draft EIR).

Comment 55-4:

Open Space

It is a shame that the developer will be able to profit significantly from building, homes on one of the last un-developed bluff tops in Southern California without having to designate any appreciable amount of the property for open space.

Instead of leaving the views and open space for future generations to enjoy as many generations have before them.[*sic*] We will be leaving them with homes, congestion, no views and little open space.

It is sad that because of a loop hole called the Quimby fund, we will not have any appreciable amount of open space left in a community that is already hard pressed for open space. A community that use [*sic*] to have open space until Hughes started developing the land, Pacific Heights entered the picture, the Gas Company started selling off their open space and now the West Bluffs Project.

We should leave preservation instead of development as our legacy to the future.

I hope that our concerns are reviewed and addressed.

Response 55-4:

As stated in the Subsequent Draft EIR, the proposed project includes the provision of public open space and recreation areas. Further, after distribution of the Subsequent Draft EIR and in response to community concerns, the applicant modified the proposed site plan to include additional open space and reconfiguration of the pedestrian trail. Reconfiguration of the pedestrian trail would allow greater public access to views of Ballona Wetlands and beyond. Please see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5 for a more detailed description of the proposed modifications regarding additional open space and reconfiguration of the pedestrian trail.

LETTER NO. 56
Signed by: Jennifer Rockwell

June 30, 1998

4482 jasmine [*sic*] Avenue
Culver City, Ca. 90232

To: Hadar Plafkin re: EIR Report No. 91-0675-SUB(CDP)(PP)(ZBA)

Comment 56-1:

I am writing to you today with regard to the West Bluff Residential Development Project in Westchester. My husband and I have lived in the West L.A. and LAX area for nearly 25 years, and my children go to day care and elementary school in Westchester. We are very familiar with the needs of this growing community and believe that this development will benefit the local community in numerous ways. It will provide homes that will attract affluent homebuyers, improve traffic flow, stimulate the economy, and yet provide for not only the protection of the sensitive environment area located below the development, but for the enhancement of an area that now benefits no one.

The developers, The Hughes Corporation and Cattelus Corporation are taking great measures to improve this area by providing a park and green belt areas that are accessible to the general public. They have repeatedly extended themselves and gone to great lengths to meet with numerous members of the community. Local residents have shared in the planning of this development and have worked with the developers to devise a plan that actually mitigates the current traffic congestion.

Unfortunatly [*sic*], there is a small vocal group who oppose this project. They are misinformed about the project and do not represent the majority. I feel I can speak for many of the local residents, business owners, and families that I personally know of who would love to move to this area when I say that this development is supported by the local residents and the greater Westchester Community.

Response 56-1:

The comment is acknowledged and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 57
Signed by: Richard A. Schoenfeld

July 3, 1998

7778 W. 79th Street
Playa del Rey, CA 90293-7902

Re: EIR No. 91-0675 / State Clearinghouse No. 92041046
West Bluffs-Tentative Tract No. 51122

Comment 57-1:

I am a resident of 79th Street in Playa del Rey, within 500 feet of the proposed project. I respectfully request a copy of the final EIR as well as inclusion in the mailing list for this project, as I have not received many critical notices in the past, including the NOP notice for this project.

Response 57-1:

Please see Responses 16-4 and 16-6 regarding noticing requirements of CEQA.

Comment 57-2:

Although my desired alternatives for the proposed site are Alternatives 1 and 6 (No project alternative with the property being purchased or donated for public use), I could support the project if neighborhood concerns as well as several deficiencies and omissions with regard to the draft EIR are realistically addressed and the negative impacts mitigated rather than ignored. Catellus Residential Group has invested approximately $25,000,000 in the land for this development and will earn a net profit of at least that much upon completion of the project. The City of Los Angeles must not back away from demanding that Catellus preserve as much of this environmentally sensitive area as possible by requiring full compliance with the California Coastal Act and the Coastal Bluffs Specific Plan as opposed to altering project boundaries to fabricate compliance. The draft EIR clearly states on several pages that the site is subject to "dual" jurisdiction and in fact more than two regulatory agencies have jurisdiction over this project. The jurisdiction issue is critical in light of the fact that the project as proposed is permanently taking away certain views and access, in direct violation of the

California Coastal Act, including §30211 and §30251. Catellus has been working with the West Bluffs Steering Committee (WBSC) to address these concerns and hopefully will grant the requests of the WBSC. This would go a long way in satisfying the needs of the adjoining neighborhood as well as bring the project into compliance in several areas of the law.

Response 57-2:

Please see Response 57-3 regarding consistency with the California Coastal Act and the Coastal Bluffs Specific Plan.

Comment 57-3:

The following areas of concern, as well as suggestions for mitigation of negative impacts, should be addressed in the final EIR before the project is approved. The items are presented in the index order of the draft EIR and should not be construed as appearing in their order of importance. All of these issues are important for both the project as well as integration into the existing neighborhood.

EARTH-Grading

Concern: The grading plan as proposed does not comply with the Coastal Bluffs Specific Plan and the California Coastal Act, both of which apply to this development. Without completely quoting these laws, the lack of compliance exists because the project as proposed fails to protect, maintain and where feasible, enhance and restore the overall quality of the coastal environment, specifically the scenic and visual qualities which should be considered a resource of public importance.

Mitigation: The grading plan should be altered, eliminating grading up throughout the development except where necessary for drainage. The grading plan should conform to the existing grade at 80th Street to enhance conformity with the existing neighborhood. Although this change would require the developer to export more soil than planned, the change would protect ocean views through Hastings Canyon, enjoyed by the neighborhood in accordance with the California Coastal Act, as well as protect the view corridors in all directions now enjoyed by visitors to the 80th, Berger and Rayford Street corridors.

Response 57-3:

As stated in the Subsequent Draft EIR (page 204), the proposed project would be developed in accordance with all applicable regulations of the Coastal Bluffs Specific Plan. The proposed residential structures would be located within Subarea 2 of the Specific Plan, which does not set additional development restrictions. The proposed project would need to comply with the Specific Plan's regulations for submittal of a soils and geology report (see page 82).

Further, the proposed project would be in compliance with the California Coastal Act with regard to protection of the scenic and visual qualities of the coastal area (see Subsequent Draft EIR, page 200). The proposed setback area, which would be created from the top of the bluff slope to the rear lot lines on Lots 1 through 27, would be dedicated as open space and act as a buffer transition between the bluff face area and the proposed residential development. The Coastal Zone Boundary is proposed to be moved landward to include this setback/buffer area, so that all areas outside of the proposed development would be protected within the Coastal Zone. Further, modifications to the proposed site plan have been made since distribution of the Subsequent Draft EIR that include reconfiguring the pedestrian path to allow greater public access to views of Ballona Wetlands and beyond (see the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, and Response 14-5). While it was acknowledged in the Subsequent Draft EIR that significant view impacts would occur from some vantages, taking into account the vantages protected by the Coastal Act (i.e., public, not private views), the extended setback distance, and the new public view opportunities which would be created, the letter and spirit of this Coastal Act policy is well maintained.

As the proposed project would comply with the Coastal Bluffs Specific Plan and the California Coastal Act (see Section IV.H, Land Use, of the Subsequent Draft EIR), it would not be necessary to alter the proposed grading plan. However, the comment is noted and will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 57-4:

PLANT AND ANIMAL LIFE

Concern: The project area to be developed is "upland" to the wetlands below and is really an important part of the wetlands ecosystem. Migratory birds and other animals need bluff top areas for survival when the wetlands are flooded. Although the bluff faces are to be "restored" in connection with the development, there is a vernal pool that exists on the bluffs, which is

ignored in the draft EIR. There have also been documented sightings of protected species by many concerned environmental groups as well as highly respected biologists including Dr. Howard Towner of Loyola Marymount University and the Friends of Ballona Wetlands. Some of the endangered and/or protected species observed include the El Segundo Blue Butterfly, the California Gnatcatcher, the Burrowing Owl, the Great Blue Heron, the Pacific Pocketmouse and Braxton's milk-vetch. Environmental appendices that had been included in the previous EIR for this project have been excluded, specifically sections X.A.3-7. These sections include a sensitive species inventory and a biota report of the Hastings Canyon area.

In a May 16, 1992 letter from Councilmember Ruth Galanter to the Department of City Planning for the NOP of the previous EIR, Ms. Galanter writes: "The West Bluffs subdivision in the Hastings Canyon area of the Westchester Bluffs is proposed for a very environmentally sensitive location. Besides considerable erosion that has taken place in several locations within the proposed tract, it is immediately upslope from the Ballona Wetlands, including areas proposed for both freshwater and saltwater marsh restorations. Proposed for a community very sensitive to development pressures, West Bluff is also located in an area informally used by local residents for recreation over portions of a number of decades."

Mitigation: The environmental appendices from the previous EIR should be updated and included in the final EIR, so that all concerned individuals will be informed of the effects of this development on the surrounding ecosystem. Because Hastings Canyon is considered by many experts to be part of the adjoining Ballona Wetlands, a complete analysis of filling this multi-acre wetland as well as mitigation of the severe negative impacts of filling the canyon must be addressed in the final EIR. It is important to note that during grading, many areas that support wildlife will be unavailable and possibly destroyed permanently. It is imperative this be considered if grading is to be done at the same time that the wetlands restoration project is moving forward as there may be a complete elimination of certain habitats, although temporary, if both areas are graded simultaneously.

Response 57-4:

It should be noted that the letter quoted from Councilwoman Galanter (dated May 16, 1992) is in regard to the previously proposed project. However, the Subsequent Draft EIR included a detailed analysis of plant and animal life on the project site. Please refer to Response 15-9 for discussion of the absence of vernal pools from the project site. Please refer to Response 13-1 for discussion of the relationship between Ballona Wetlands and the project site. Please refer to Responses 13-3 through 13-6 for discussion of the sensitivity of resources on the project site.

With regard to Appendix F, Biological Resources Reports, in Volume 2, Technical Appendices, all of the reports included in the previously prepared 1993 EIR are included in the Subsequent Draft EIR, albeit in a different order and without the original 1993 EIR Appendix numbering. As the 1993 EIR and accompanying appendices are incorporated into the Subsequent Draft EIR by reference, their inclusion in the Subsequent Draft EIR is voluntary and was done to facilitate review.

With regard to informal recreational use of the West Bluffs project site, which represents private property, please refer to Response 13-17 for discussion of open space preservation and provisions as part to the proposed project. Refer to the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, for further elaboration regarding open space provisions of the proposed project.

Comment 57-5:

LAND USE

Concern: Despite the conclusion on page 208 of the EIR that the proposed project would have no significant land use impacts, the EIR has overlooked and failed to mitigate several significant impacts defined in the California Coastal Act, the Coastal Bluffs Specific Plan, the Scenic Highway Plan and the Public Recreation Plan. The most significant impacts relate to §30211 of the California Coastal Act by eliminating public access to the sea (including views), particularly along the northwest portion of the proposed development, where Hastings Canyon is being filled and the Veragua Walk easement is totally ignored. This is the only area of the development where ocean views, which have been enjoyed here by the neighborhood for decades, could continue to be available to the public without dedicating open space lots. These impacts also violate §30251 of the California Coastal Act by failing to protect these views to the ocean and scenic coastal area.

Response 57-5:

Please see Response 57-3 regarding consistency with the California Coastal Act and the Coastal Bluffs Specific Plan.

As stated in the Subsequent Draft EIR (page 205), the proposed project would affect only a relatively minor portion of the field of view available from the scenic corridor and would be developed in accordance with standards and criteria of the Scenic Highways Plan to ensure

perpetuation of the corridor's scenic qualities. Further, the proposed project would be developed in accordance and consistent with local zoning ordinances and applicable Specific or District Plan land use elements of the General Plan which were designed to be consistent with all of the elements of the General Plan, including the Scenic Highway Plan. Therefore, since the project is consistent with the zoning ordinances and land use plans of the General Plan, and is consistent with the general objectives and development criteria of the Scenic Highways Plan, a significant impact would not result.

Comment 57-6:

The limited setbacks at many locations along the bluff top will detract from the view of the bluffs along the Culver Boulevard corridor, similar to the negative aesthetic impacts of the UCLA homes and the Kentwood/Dunbarton developments visible along Jefferson Boulevard east of Lincoln Boulevard. Setbacks should be set at 100 feet from the bluff top to avoid this situation.

Response 57-6:

Please see Response 13-14 regarding bluff setbacks.

Comment 57-7:

The Public Recreation Plan suggests 2.1 acres of Park and Recreation Space (usable) should be dedicated as part of the development. In light of the shortage of Park and Recreation space in the surrounding area as well as throughout the City of Los Angeles, in-lieu fees (Quimby Act) should not be considered an acceptable substitute for the loss of views and environmental habitat to the community. I understand that the Deputy Advisory Committee does have the authority to reject in-lieu fees and require active open space in subdivisions of more than 50 lots and that should certainly be a requirement for project approval.

Mitigation: Catellus has been working with the WBSC to address these open space and view issues. The negative impacts can be mitigated if Catellus agrees to provide the following items:

a) Elimination of the emergency gate at 79th Street in favor of landscaping and open areas while addressing the needs of the Fire Department. The design presented on page 241 of the EIR is not aesthetically pleasing for residents of the existing neighborhood. It

has been described by many as resembling the gates hiding the trash containers at the local supermarket. A set of 36" high white "pipe" style gates, similar to those found in many park and library parking lots, would provide an adequate barrier to non-emergency traffic while preserving view characteristics. This emergency access is in the least accessible location and this will be discussed further below.

Response 57-7:

The revised Tentative Tract Map No. 51122 as submitted to the City in October of 1998 provides approximately 1.96 acres of passive and active park/recreation area. The remainder of the project's park space requirement pursuant to City Code is to be satisfied with in-lieu fees. Recreation and Parks Department staff of the City of Los Angeles (in meetings with the developer on May 28, 1997 and July 14, 1998) indicated that due to the relatively small amount of park land (2.1 acres) the City can require for this project pursuant to adopted City Codes, they would prefer payment of in-lieu fees. By law (State Quimby Act and City Codes) the park land/fee requirements are not intended to be used as a substitute for any perceived loss of views. In addition to the park area dedication, the project proposes an additional 15.37 acres of open space within the project site, most of it as an environmental habitat preserve area.

The comment regarding an alternative design to the conceptual design for the emergency access gate will be forwarded to decision makers for consideration in reviewing the project proposal.

Comment 57-8:

b) Additional park like space at Hastings and Park Hill, creating view corridors through the development. Each of these areas would be in excess of 10,000 square feet, creating view corridors into the development.

c) Additional park like space along 81st Street at Colegio.

Response 57-8:

Please see Response 13-7 for more detail on modifications to the proposed project regarding open space. Under the proposed modifications Lot 127 (Park Hill Avenue and 80th Street) will be 0.31 acres (13,510 sq.ft.), and Lot 128 (Hastings Avenue and 80th Street) will be 0.29 acres (12,638 sq.ft.). In addition, a new 15-foot wide lot (Lot 129) has been created on 81st Street.

Comment 57-9:

d) Bluff access completely around the project, starting near 79th Street along the existing Veragua Walk easement and connecting with the trail on the east end of the development either along the bluff top or along Cabora Road. This bluff access trail will preserve the ocean views that have been enjoyed by neighborhood residents for decades.

Response 57-9:

Please see Responses 14-5 and 14-6 regarding modifications to the proposed pedestrian trail.

Comment 57-10:

TRANSPORTATION AND CIRCULATION-Traffic and Access

Concern: Despite the conclusion on page 252 of the EIR that the project is not expected to result in any traffic impacts at the study intersections, the intersection of 83rd Street and Lincoln Boulevard is decreasing from a Level of Service (LOS) of "E" to a LOS of "F" in the AM peak hours. The impact numbers, which could have been rounded down, are within .001 of the City of Los Angeles' guideline for being considered a significant impact. The impact will be even worse in the short term as construction traffic enters the neighborhood before the road at Hughes Terrace is completed and usable by contractors. Considering that this intersection is projected to be burdened with almost 15,000 trips per day, these are significant impacts for an intersection that will be performing at an F level. It should be noted the next largest intersection in the study, which is a block away from the intersection in question, is projected to handle just over 5,000 trips per day.

Response 57-10:

It is unclear as to how the commentor arrived at the daily traffic increases noted, and what the commentor was referring to regarding "the next largest intersection." As fully discussed in Section IV.N.1 of the Subsequent Draft EIR, the proposed project is not expected to result in significant impacts at any of the study intersections, nor are impacts expected within the neighborhood street system. It must be noted that construction traffic will occur prior to the addition of the project's full traffic load, and will generally not overlap it significantly. See also Responses 25-4, 25-6, 38-2, and 49-2.

Comment 57-11:

Mitigation: The City of Los Angeles must require this intersection be modified in Phase I traffic as a condition of project approval. In a November 30, 1993 letter from the Los Angeles Department of City Planning commenting on the previous NOP for the EIR, a copy of which is included in the appendices to the previous EIR for this project, the following recommendations were made regarding Lincoln Boulevard and 83rd Street:

a) Widen the north and south sides of 83rd Street by 10 feet from Lincoln Boulevard westerly to Colegio Drive to provide a 60-foot roadway within the existing 80-foot right-of-way. Revise the striping on 83rd Street between Lincoln Boulevard and Rayford Drive to provide for dual left turn lanes and a thru/right turn lane for eastbound traffic at Lincoln Boulevard and 22-foot inbound lane.

b) Modify the curb returns on the northwest and southwest comers of Lincoln Boulevard and 83rd Street to provide 30 foot curb radii.

c) Modify the curb return on the northeast corner of 83rd Street and Colegio Drive to provide a 40-foot curb radius and on the southeast corner to provide a 30-foot curb radius.

Response 57-11:

The revised project, which is analyzed in detail in the Subsequent Draft EIR, does not result in significant impacts at the noted location. Therefore, no project improvement to this intersection is required. If certified, the Subsequent Draft EIR's findings will supersede the 1994 Final EIR on the previous project, which was not certified. See also Responses 14-13, and 41-14.

Comment 57-12:

d) In conjunction with the 10-foot widening of the north side of 83rd Street between Lincoln Boulevard and Campion Drive under BD-400250, widen the south side of 83rd Street by 5 feet from Lincoln Boulevard easterly to the alley to provide a 55-foot roadway within the existing 80-foot right-of-way. Revise the striping on the east leg of Lincoln Boulevard and 83rd Street to provide for a left turn lane, a through lane, a right-turn only lane and an 18-foot inbound lane.

Response 57-12:

The improvements noted for BD-400250 have been completed. See also Response 57-11.

Comment 57-13:

e) Modify the curb return on the southeast comer of Lincoln Boulevard and 83rd Street to provide a 30-foot curb radius.

Response 57-13:

See Response 57-11.

Comment 57-14:

f) Relocate and upgrade traffic signal equipment to the satisfaction of the LADOT.

The above traffic recommendations will truly solve a long-term neighborhood problem created by previous development within the area that will be exacerbated by the proposed project.

Response 57-14:

See Responses 57-10 and 57-11.

Comment 57-15:

Concern: The emergency access provided to the proposed project at 79th Street is located at the least accessible location for emergency vehicles. I refer you to the neighborhood map on page 238 of the EIR to understand this explanation. By providing the access at 79th Street and Berger Avenue, police, fire and medical emergency vehicles must use an extremely circuitous route along narrow curving streets to the project because neither Berger Avenue nor 79th Street directly connect to Manchester Avenue or 83rd Street. The project area will be served by City Fire Station No. 5 located on Manchester Avenue and Los Angeles Police Pacific Division located on Culver Boulevard. If Hughes Terrace was not accessible, the Fire Department would most likely enter the neighborhood from Manchester Avenue and the LAPD would most likely enter the neighborhood from Lincoln Boulevard or Manchester. The most direct emergency access location would be at 80th Street and Hastings Avenue. Hastings was widened

when the Pacific Heights development was built by Lewis Homes and it connects to 80th Street, 83rd Street and Manchester Avenue. The width of Hastings would easily accommodate the largest pieces of fire equipment as well as provide straight access into the development from Manchester. The next best alternative is Park Hill because of the direct access from Manchester, however Park Hill is a narrower street than Hastings, with more curves than Hastings.

Mitigation: The emergency access location should be relocated from 79th Street and Berger Avenue to 80th Street and Hastings Avenue. The 79th Street emergency access would become a larger landscaped open space adjoining the "E" Street cul-de-sac, without sacrificing any lots or houses in the project simply by eliminating the curb cuts and 20-foot easement at 79th Street. This would also provide a view corridor to the mountains through the development near the recommended bluff access at the northwest end of the project. Catellus has been discussing additional open space at Hastings Avenue (approximately 100 feet wide) with the WBSC, which could easily be connected to the "G" Street cul-de-sac and configured to handle the weight and width requirements of the City of Los Angeles Fire Department. Maintaining the emergency access designation and restrictive easement at this location will satisfy the neighborhood concerns about traffic cut-through from the development and Lincoln Boulevard and will not alter the present traffic plan which does not provide access through the neighborhood.

Response 57-15:

City of Los Angeles Fire Department staff have indicated in discussions with the developer that the emergency access should be located as far away from the Lincoln Boulevard access as possible. This limits the amount of residential lots in the project that could potentially be cut off from emergency access. Because the proposed emergency access is at the far end of the project from the Lincoln Boulevard access, virtually every lot in the project can be accessed from either end of the project for emergency purposes. The City Fire Department has indicated that Street "E"/Berger Avenue/79th Street is the preferred location for the emergency access. The open space Lots 127 and 128 on 80th Street at Park Hill Drive and Hastings Avenue have been widened to 100 ft. and could potentially be used also for emergency access. See also Responses 9-1, 34-2, and 36-7.

Comment 57-16:

PUBLIC SERVICES-Parks and Recreation

Concern: It is no secret that the City of Los Angeles does not have adequate parks and open space. An article in the Metro section of The Los Angeles Times on June 15, 1998 highlights just how short of the goal of 4 acres of parkland per 1,000 residents Los Angeles really is. The Sixth District, which includes the proposed project, has only 1.1 acres per 1,000 residents. The proposed project site is the last open space in the area so it is critical that the maximum amount of space be required and dedicated for usable Park and Recreation space.

In a May 16, 1992 letter from Councilmember Ruth Galanter to the Department of City Planning for the NOP of the previous EIR, Ms. Galanter writes: "While this site has not been consistently accessible to the general public over the years, it does lie within a community both statistically and realistically short of recreational open space. Any proposed development project should provide as much public open space as is feasible, both for passive and active recreation, including viewing, walking, jogging, picnicking and so forth. A portion of the Cabora Road right-of-way passes through the site on the bluff face. This right-of-way, though mostly unimproved, has provided an ad-hoc recreational opportunity to the community and the region for many years and any project must be designed to provide for continued public access to and from this resource."

Mitigation: Please refer to my comments above regarding Land Use. The mitigation recommendations presented in that section of this letter will go a long way to mitigate the effects on the neighborhood of losing this last bit of open space. These recommendations do not really satisfy the minimum space requirements, but they will generally satisfy neighborhood concerns provided the bluff access at Veragua Walk is made available to the public.

Response 57-16:

Please see Responses 57-5 through 57-9 for a discussion of land use, parks, and recreation.

Comment 57-17:

SAFETY

Concern: Please refer to my comments on the emergency access presented above regarding Transportation and Circulation-Traffic and Access. The location chosen for emergency access is the least direct and therefore, most unsafe location in terms of public safety. In the event of a medical emergency, seconds count and traveling out of the way down narrow streets could mean minutes. This relocation can be accomplished without sacrificing any lots or houses within the project. This access should be relocated as a condition of project approval.

Mitigation: Please refer to my comments on the emergency access presented above regarding Transportation and Circulation-Traffic and Access. Simply relocate the emergency access to a more direct location such as 80th Street and Hastings Avenue.

Response 57-17:

Please see Response 57-15 regarding emergency access.

Comment 57-18:

AESTHETICS AND VIEWS

Concern: Certain views are being needlessly destroyed because of the present layout of the proposed project. Page 358 of the EIR states "The project would alter the aesthetic environment and the views of the neighborhood south of the development." The EIR further states on page 359 "Although only a few homes would be affected and the proposed project does not conflict with city regulations relating to view resources, development would significantly impact views of the site and beyond as seen from some homes and from other public vantages to the south of the project site." While City regulations may not protect public views for adjoining neighborhoods, the California Coastal Act and the Coastal Bluffs Specific Plan certainly do. That is the spirit and intent of both of those laws. The EIR concludes on page 365 under the heading of Environmental Impact After Mitigation: "However, development of the site even after mitigation measures would significantly impact views from some homes and public vantages south of the project site and from the same areas north of the project site." Additional mitigation, which will not require sacrificing any lots or houses in the project should be required as a condition of project approval.

Mitigation: I again refer you to my comments on mitigation in the Land Use section above. In addition, my comments on mitigation in the Grading section should also be considered.

Response 57-18:

Please see Responses 57-3, and 57-5 through 57-9.

Comment 57-19:

In conclusion, there are many parts of the proposed project that do not comply with Federal, State and Local laws and ordinances, but can be brought into compliance without dramatically altering the project. The WBSC has been trying to work with Catellus to accomplish this goal of compliance and much of the recommended mitigation is included within this letter.

This is the last remaining open bluff top in the area. It is tied into the wetlands ecosystem through Hastings Canyon and because it is an "upland". We must protect as much of this area as possible for both the plants and animals occupying the area as well as human enjoyment as protected by law.

I strongly urge you to require the park and recreation space that the WBSC is requesting from Catellus, including the bluff top trail along the existing Veragua Walk easement, as a condition of approval of the project. In addition, the intersection of 83rd Street should be modified in Phase I traffic as the numbers clearly demonstrate this is a substandard intersection. In the interest of public safety, relocate the emergency access to a directly accessible location.

Requiring all of these things as a condition of approval will not significantly affect Catellus' interest in the development and will certainly satisfy many neighborhood concerns as well as ensure compliance with multi-jurisdictional ordinances and laws that are not satisfied by the proposed plan.

Response 57-19:

This comment will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 58
Signed by: Thomas J. Stelmach, D.D.S.

July 2, 1998

Westchester Medical Plaza
8540 S. Sepulveda Blvd., Suite 808
Los Angeles, CA 90045

Re: EIR Report No. 91-0675-SUB(CDP)(PP)(ZBA)

Comment 58-1:

I am a proponent of the proposed West Bluff Residential Development Project in Westchester. I am both a business owner and a resident of the area, and I drive past this vacant parcel of land on a daily basis.

The area in its present condition is an eyesore. The parcel is a flat weed-choked lot that is fenced off. This land is of no benefit to society or wildlife in its current state. During each rainy season there is mud filled runoff that ends up on Lincoln Blvd. Lack of water management also causes further erosion to the bluff face.

It is my understanding that the development will control water runoff, and therefore reduce further erosion. Water and mud control should help the environmentally sensitive area below this proposed development.

Response 58-1:

These comments are acknowledged for the record and will be forwarded to the decision makers for their review and consideration in reviewing the project proposal. Please refer to Response 30-1 for discussion of the role of erosion in sedimentation in the Ballona Wetlands and project impacts upon this process.

LETTER NO. 59
Signed by: Richard Terzetre

July 6, 1998
Richard Terzetre
[No Address]

Subject: West Bluffs Project Subsequent Draft Environmental Impact Report. May 1998

Comment 59-1:

After my looking over this report any thought of a single tenant, as myself to challenge the Applicant's project objectives seems like a lost cause. My name had no DAVID in it anywhere and ar [*sic*] my age, a sling shot would be quite inaccurate. After 32 years of living at 7462 W. 80th my neighbor and I have seen how fast any changes which could benefit our area can take to implement.

1) The stop 2 way [*sic*] sign at 80th & Hastings is a good example. It was requested over 25 years ago. A study was made. Signs all over where [*sic*] set up – but no sign at 80th & Hastings which was the original request.

2) A fence was requested to keep out motorcycles in the open field opposite 80th St [*sic*] on Sat & Sunday mornings. Having jogged there over 30 years ago we where[*sic*] aware of the dangers. It took a cycle accident and a lawsuit in the high numbers to get that problem taken care of. (Never end a sentence in a perpostion [*sic*]!) Think it took place in the 70's against SWMA.

Response 59-1:

This comment is an introductory paragraph to the commentor's letter and does not require a separate response. The stop signs on 80th Street at Hastings Avenue referred to by the commentor were recently installed by LADOT.

Comment 59-2:

In any event, this short letter has one point to make:

Do not give away the public land at the bottom of Hastings Canyon to the Applicants (the developers). Rather give it to the community. A single request. It was promised and it [*sic*] ours as city tax payers. No Marina.

Response 59-2:

Please see Responses 7-11 and 31-6 regarding Hastings Canyon. The comment regarding "No Marina" will be referred to the decision makers for consideration in reviewing the project proposal.

Comment 59-3:

A note:

1) P. 421-the last sentence in the first ¶. "In accordance with CEQA..." is a wonderful example of Double Speak.
P. 422-My compliments to one(s) who thought of the Alternatives Concept. It should be in a Pearl Harbor File.

Response 59-3:

It is unclear what is meant by the comment, however, the comment is noted and will be referred to the decision makers for their consideration in reviewing the project proposal.

Comment 59-4:

2) It would have been nice to have had more than 2 months rather than less to review this report.

Response 59-4:

The public review period for the West Bluffs Subsequent Draft EIR began on May 21, 1998 and officially ended on July 6, 1998, lasting two days beyond the required minimum 45-day

review period required by the California Environmental Quality Act (CEQA). Comment letters were accepted and responded to in the Final EIR up to July 13 1998, providing a total of 54 calendar days for public review and comment. Please also see Response 16-4 regarding the required public review period.

Comment 59-5:

3) Where is the "devaluation of property values of the houses in 80th Street" in table 60 (p. 422)

Response 59-5:

Please see Response 25-7 regarding analyses of economic impacts.

LETTER NO. 60
Signed by: Patricia Trujillo

July 1, 1998

7377 W. 83rd Street
Los Angeles, CA 90045

File# 91-0675-SUB(CDP)(PP)(ZBA)

Comment 60-1:

This letter is sent to urge you to stop the destruction of the La Ballona Wetland and to maintain Hasting Canyon under the protection of the California Coastal Commission.

It appears that some confusing information about the nature of this area has been disseminated.

I have been a Westchester resident for 34 years, and I can verify that the wetland area does contain a large vernal pool--I have seen blue heron, white egrets, mallards and other waterfowl in the pool each spring for many years. This last year the rainfall of El Nino brought scores of birds to the area. It was a pleasure to watch the birds in the pool on my way up and down Lincoln hill on my way to work in the crowded mid-Wilshire area.

Response 60-1:

Please refer to Response 15-9.

Comment 60-2:

It is my understanding that two Native American village sites would be covered over by the development of the blufftop overlooking the wetlands to say nothing of the destruction of wildflowers indigenous to this last piece of coastal prairie.

Response 60-2:

With regard to archaeological resources, please refer to Responses 34-8 and 37-3. Please refer to Responses 13-3 through 13-6 for discussion of the sensitivity of biological resources on the project site.

Comment 60-3:

Even if there were some way to safely fill Hastings Canyon for development (and given the unstable nature of the wetland, I do not believe that can ever be accomplished), do we really want to pave every last inch of our coastline?

Response 60-3:

Presently, pursuant to Tract 9167, 17 recorded legal lots and 0.80 acres of dedicated street right-of-way (Hastings Avenue) are within Hastings Canyon. The project plans to locate 11 proposed residential lots and 0.57 acres of proposed street right-of-way on top of the proposed Hastings Canyon fill. The proposed project plan would appear to represent a reduction in the amount of future "paving" in the area of Hastings Canyon from that which could result from currently approved Tract 9167.

To fill Hastings Canyon and provide stable building pads, the existing loose deposits at the bottom of the canyon will be removed and the sides of the canyon will be laid back prior to the placement of compacted fill earth. A 2:1 slope will be manufactured with drainage benches along the westerly boundary of the site to provide for building structures. The slope is to be vegetated to reduce erosion and to improve the surficial stability of the bluff face. The project will be subject to the requirements of City engineering staff and the project geotechnical reports. Specifically, mitigation measures for the proposed grading scheme are included in the following reports which were reviewed and approved by the City of Los Angeles Bureau of Engineering and Department of Building and Safety: *Geotechnical Investigations and Grading Plan Review, Tentative Tract 51122, West Bluff Property, Westchester Area, City of Los Angeles, California*; Pacific Soils Engineering, Inc., July 7, 1997 and *Grading Plan Review, Tentative Tract 51122, West Bluff Property, Westchester Area, City of Los Angeles, California*; Pacific Soils Engineering, Inc., February 11, 1998.

Comment 60-4:

What about future generations who will never know the joy I have had in watching the migratory birds stopping at the vernal pool on their long flight? Don't we want some open space left for our children and our grandchildren to enjoy?

Please do not approve the development of this area, it should remain as protected coastline and not destroyed.

Response 60-4:

Please refer to Response 32-2 for discussion of open space preservation and provisions as part to the proposed project. Refer to the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR, for further elaboration regarding open space provisions of the proposed project.

LETTER NO. 61
Signed by: John Ulloth

July 8, 1998

8016 Gosford Avenue
North Hollywood, California 91605

Comment 61-1:

I am appalled the Planning Department is even considering a proposal that would destroy the last coastal prairie on the Westchester Bluffs-the last of its kind in Los Angeles. If permitting the destruction of Westchester bluffs' east end with the so called "U.C.L.A. housing" (which is neither affordable-to nor inhabited-by associates of that institution) is any indication, Ballona Westbluff proposal will prove to be the same environmental and visual fraud... and have you no professional shame for permitting that adjoining holocaust called Playa Vista?

Response 61-1:

Please refer to Responses 13-3 through 13-6 for discussion of the sensitivity of biological resources on the project site.

Comment 61-2:

Given the nature of forces that shape Westchesters [*sic*] soft blufftop (erosion, seismic activity) it is absolute lunacy for your department to allow anyone to construct or fill anything there! Is the Planning department so blind to miss the imperiled nature of existing houses previously permitted, now for sale, drooping over the bluff's edge?

Response 61-2:

The project will be subject to the requirements of City engineering staff and the project geotechnical reports. Specifically, mitigation measures for the proposed grading scheme are included in the following reports which were reviewed and approved by the City of Los Angeles Bureau of Engineering and Department of Building and Safety: *Geotechnical Investigations and Grading Plan Review, Tentative Tract 51122, West Bluff Property, Westchester Area, City of Los Angeles, California*; Pacific Soils Engineering, Inc., July 7,

1997 and *Grading Plan Review, Tentative Tract 51122, West Bluff Property, Westchester Area, City of Los Angeles, California*; Pacific Soils Engineering, Inc., February 11, 1998. These measures include a large setback from the bluff face to the rear property lines of the lots at the top of the slope, and a drainage bench at the top of the slope to intercept and redirect storm water run-off via non-erodable devices to approved disposal areas. Further, the natural bluff face is to be vegetated to reduce the amount of erosion from storm water runoff and improve surficial stability of the bluff face. The geotechnical mitigation measures and grading plan have been reviewed by the City technical experts and deemed to be adequate for the purpose of protecting the health and safety of the public. Following project implementation, the safety of structures to be built at the top of the bluff and for homes currently on the edge of Hastings Canyon will be greater than that for existing structures elsewhere along the Westchester bluffs. See also Response 31-10.

Please refer to Responses 13-3 through 13-6 for discussion of the sensitivity of biological resources on the project site.

Comment 61-3:

Who needs stop signs and speed bumps? Impediments to traffic and automobile suspensions that contribute nothing to Los Angeles' desperate need for natural, open spaces... stop signs and asphalt bumps; useless to nature, made necessary only by and for subdivisions! What needs stopping is the ruin of America by bulldozers & subdivisions; what deserves bumping are the heads of greedy owners & developers who think nothing of destroying nature & disrespecting Native American sites.

The priorities of Los Angeles Planning Department-as practiced-are wrong, you know it: They ought to be **#1)** Defensive: preservation & enhancement-if need be by acquisition-of all of Los Angeles' vanishing & irreplaceables: wild habitat/natural lands, archaeological sites, rights-of-way, historic structures & estates-for example, this last surviving scrap of coastal prairie! **#2)** Forcing the power of Los Angeles' contractors, developers, lenders & corporations **out of places like Ballona, into those places with demonstrable needs-**South Central, East Side-creating mechanisms for apprehending & fining slumlords, restoring, infilling, & reconstructing devastated communities (like C.R.A. can't, investors & banks won't, and "Rebuild L.A." never did).

Today, planning L.A.'s future does not take place in City Hall where it should, but in the job trailers of contractors, offices of developers and highway lobbyists, boardrooms of mega-

corporations & banks: the people who prove themselves supremely ignorant of urban planning principles & wisdom. In order for the L.A. Planning Department (who are supposed to act as our leaders & experts) to do their job & build up this city, you must immediately seize leadership-**Stop submitting to the bondage of developers**, stop granting occupancy approvals for all flood plain & hillside areas, stop approving speculative development wherever high vacancy rates (say >10%) exist, stop all exurbs and car-only development, stop caving in to big money! Yes, you're going to need lawyers, more staff, and have a war with Planning Ignoramus Dick Riordan, (who thinks the answer to urban problems is a faster permit approval process)... but the future of Los Angeles-if it is to be beautiful & livable, (more natural open space for endangered plants & animals, less for subdivisions & gridlocked freeways) demands you start here & now:

L.A. Planning, get a grip!: turn down this Ballona Westbluff proposal & all others of its ilk! Take action to stop the annual plowing today, and protect this land as a nature preserve!

NO PROJECT AT BALLONA WESTBLUFF-NOW OR EVER!

Response 61-3:

This comment is acknowledged for the record and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 62

Signed by: Ataollah Walizadeh, Nahid Emam Walizadeh, Omid Walizadeh, and Mohammad Walizadeh

July 1, 1998

[Four individual letters with identical text.]
7468 W. 80th Street
Los Angeles, CA 90045

Comment 62-1:

I, Ataollah Walizadeh, resident of 7468 W. 80th St. LA CA 90045 am writing this letter in regards to the huge problem with the building plans for the Coastal Bluffs and Hastings Canyon. I am a proud Westchester resident and it upsets me when a company with pockets full of money can simply come and transform a neighborhood as they please. I completely acknowledge that Catellus has sat down and listened to our concerns; however, the bottom line remains that our concerns will not be met when they begin to build. First they scared us by wanting to build a dividing wall and since then they have been making these small compromises in an attempt to quiet down the neighborhood's true concerns.

Response 62-1:

These concerns will be forwarded to the decision makers for their consideration.

Comment 62-2:

The California Coastal Act clearly states that the coastal scenic view will be considered in all development, "Permitted development shall be sited and designed to protect views to, and along the ocean and scenic coastal areas." The last set of building drafts that Catellus did provide for the neighborhood clearly shows that our views will be obstructed. This fact was reported by the E.I.R.

Response 62-2:

Please see Responses 57-3, and 41-17 regarding consistency with the California Coastal Act. It was acknowledged in the Subsequent Draft EIR that significant impacts would occur with

implementation of the proposed project with regard to views from the adjacent residences. The comment will be forwarded to the decision makers for consideration in reviewing the project proposal.

Comment 62-3:

In addition, the Hastings Canyon will be completely filled up. This is also in direct opposition to another point of the Coastal Act, "to minimize the alteration of natural land forms." It seems as if Catellus' power even allows them to change certain city codes, in order for them to fill the Hastings Canyon. How is this possible? Is this right?

Our coastal and city view is one of the major reasons why my family moved here and I believe that the California Coastal Act will be worthless and pure nonsense if the city doesn't enforce it.

Response 62-3:

Filling of Hastings Canyon, which is the result of urban runoff and not considered a unique physical feature of the site, would be completed in order to stabilize the bluffs by correcting the existing erosional problems associated with the project site would repair and enhance the bluff face. Please see Response 57-3 regarding the proposed project's consistency with the California Coastal Act. Further the proposed project would comply with any conditions of approval given by the City of Los Angeles and applicable codes and regulations. However, the commentor's concerns regarding the filling of Hastings Canyon will be referred to the decision makers for consideration in reviewing the project proposal.

The proposed project site has been zoned for residential development for a number of years (please see Response 17-2) and could have been developed as such; however the concerns of the commentor regarding views will be forwarded to the decision makers reviewing the project proposal.

Comment 62-4:

What's the point for our community to sit around and talk about compromising and rights, if the city and building company are just going to ignore all of the neighborhood's concerns in the long run? Our neighborhood has made our voice heard, but it truly seems that the new housing will violate our rights just as it would have in its first form. Apparently, all of our meetings

and efforts are not valued by the city; whereas, the city's support for our needs is close to invisible. In all of the meetings held at City Hall, all of the neighbors stressed their anger against this project and the city development committee, and while the committee seems to agree with us, no results has [*sic*] been accomplished. This lack of attention and violation of our rights is not what our community deserves!

Even though we pay taxes and are attempting to work with Catellus, they merely think that more stop signs and traffic control will make us forget our major concerns. In addition, the city's lack of action is allowing Catellus to continue right along. Catellus is simply taking the neighborhood for a run around, and (unfortunately) our city is allowing this to happen.

Response 62-4:

The commentor's concerns will be forwarded to the decision makers for their consideration in reviewing the project proposal. In response to early input from the community, prior to preparation of the EIR, the project design was modified to remove the wall and orient the proposed homes on 80th Street so that they take access directly from 80th Street.

LETTER NO. 63
Signed by: Dorathy M. Wood

July 1, 1998

22228 Cass Avenue
Woodland Hills, CA 91364

Comment 63-1:

Please preserve Ballona ecosystem. Nature [*sic*] wetlands homes can't go elsewhere. Developers have whole inland to develop. Go-elsewhere to develop & profit!

Marina Del Rey & other land in area was taken for profit from wildlife! Leave the tiny area remaining!

Sincerely, & Thank You, for the wildlife!

Dorathy M. Wood (77 Age)
Native, who's seen southern California natural areas disappear to profiteers.

The world needs more than people & buildings!

Response 63-1:

This comment is acknowledged and will be forwarded to the decision makers for their consideration in reviewing the project proposal.

LETTER NO. 64
Signed by: Mrs. Florence Wood

July 8, 1998

7526 W. 80th Street
Los Angeles, CA 90045

West Bluffs Development
Tentative Tract #51122

Response and Position Statement for the West Bluffs

Comment 64-1:

I am a widow who has lived on 80th St for the last 30 yrs. I have loved this area and had hoped to finish my life here.

I am concerned about the traffic this development will bring. It is very hard to get to Lincoln Blvd now. What will it be like in another year?

Response 64-1:

Estimates of future traffic conditions in the study area are fully detailed in Section IV.N.1 of the Subsequent Draft EIR. See also Responses 25-4, 38-2, 41-16, and 49-2.

Comment 64-2:

I don't want to be cut off from my view or to be locked out of my right to walk the Bluffs. We need some kind of open space to enjoy this like a small park.

Response 64-2:

The project includes a trail system and a small view park, as described in the Subsequent Draft EIR. The project open space configuration and the trail system have since been modified to provide additional open space along 80th Street and to move the bluff trail closer to the top of

slope. Please refer to the revised Project Description in Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 64-3:

What do I do when these big trucks + equipment starts [*sic*] working across the street from me? The noise + the dust will kill me off. How do I keep my house clean? The dust will be every place. I can't afford a hous [*sic*] cleaner. It takes most of my time now keeping the place clean. Is the Development going to help older people like me take care of this problem?

I have gone to all of the meetings except one and have asked many questions but all I got was a lot of double talk.

Response 64-3:

To help reduce construction impacts, a mitigation measure has been added to enforce the Applicant's Required Mitigation Practices which would minimize construction impacts. See Section II, Corrections and Additions to the Subsequent Draft EIR.

Comment 64-4:

Please consider some of these things I have mentioned. They are not big issues but I would like to have them heard.

Response 64-4:

This comment is a closing paragraph to the commentor's letter and does not require a separate response.

Appendices

Appendix A
Mitigation Monitoring Program

APPENDIX A
MITIGATION MONITORING PROGRAM

INTRODUCTION

As of January 1, 1989 the California Environmental Quality Act requires a Mitigation Monitoring or Reporting Program. This program has been prepared in compliance with the requirements of Section 21081.6 of the California Environmental Quality Act (CEQA). The Draft Environmental Impact Report (EIR) for the project identifies the significant environmental impacts associated with the project and specifies a series of measures designed to mitigate adverse impacts to the environment. The Mitigation Monitoring Program describes the procedures the Applicant will use to implement the mitigation measures adopted in connection with the approval of the project and the methods of monitoring and reporting on such action. Monitoring refers to the observation of mitigation activities at the project site, in the design of plans or in the operation of programs. Reporting refers to the communication of the monitoring results to the City and other designated agencies. A Monitoring Program is necessary only for impacts which would be significant if not mitigated.

The project Applicant shall be obligated to provide documentation to the appropriate monitoring agency and the appropriate enforcement agency as provided for herein. All departments listed below are within the City of Los Angeles unless otherwise noted.

PURPOSE

This Mitigation Monitoring and Reporting Program has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act. It is the intent of this program to:

1. Verify satisfaction with the required mitigation measures of the EIR;
2. Provide a methodology to document implementation of the required mitigation;
3. Provide a record of the Mitigation Monitoring Program;
4. Identify monitoring and enforcement agencies;
5. Establish administrative procedures for the clearance of mitigation measures;

6. Establish the frequency and duration of monitoring and reporting; and

7. Utilize the City's existing review processes wherever feasible.

ADMINISTRATIVE PROCEDURES

Mitigation monitoring reports shall be submitted to the City on a annual basis, starting on the twelfth month following the certification of the EIR and continuing until the mitigation program is complete. Records and documentation of compliance shall be maintained by the project Applicant and submitted to the City as appendices to the annual monitoring reports. All associated reports and documentation shall be open for inspection by the project Applicant, the public, responsible agencies and others as designated by the Director of Planning.

The City's existing planning, engineering, review and inspection processes will be used as the basic foundation for Mitigation Monitoring Program procedures, and will also serve to provide the documentation for the reporting program. Since these processes address many complex issues, the project mitigation Monitor will distill and separate this information into an annual summary report with technical appendices which will be delivered to the City.

Reporting consists of establishing a record that a mitigation measure is being implemented. This will involve the following steps.

1. All annual reports will be issued to the EIR lead agency and applicable Enforcement Agency.

2. Reports shall be issued annually commencing 12 months following EIR certification in a form and format approved by the Director of Planning.

3. Remedial actions to correct non-compliance shall extend monitoring and reporting as necessary to assure compliance. Remedial action reports will be issued to the applicable Enforcement Agency within 10 days of completion of such remedial action.

4. Evidence such as verification forms, letters, signatures, and initials, shall be maintained as an appendix to annual reports.

5. Annual reports and appendices will be on file in the Department of City Planning and will be publicly available to all interested parties.

6. All reporting forms indicating non-compliance with any required mitigation measure of the EIR shall be issued within 5 working days of discovery to the designated City agency with a copy to the property owner/project Applicant or authorized representative.

MONITORING PROCEDURES

The project development process generally falls into three phases relevant to the MMRP:

1. Design/Pre-Construction;
2. Construction; and
3. Operation.

Directly related to these phases of development are three implementation mechanisms:

1. The incorporation of mitigation measures into the project design;
2. The incorporation of mitigation measures into construction contracts; and
3. The implementation of mitigation measures by administrative action.

Mitigation measures such as building setback restrictions and landscaping requirements are made conditions of Project Permit approval and must be cleared before a building permit can be issued. Mitigation measures such as highway design, plumbing specifications and sewer programs provide requirements for the design of the project. This type of mitigation measure is generally implemented through the incorporation of the mitigation measure into the project design.

Mitigation measures such as truck hauling route restrictions, dust control methodology and work hour restrictions provide guidance for the construction phase of the project. This type of mitigation measure is generally implemented through the incorporation of the mitigation requirement into the language of the construction contract documents.

Recommendations for on-going traffic management, landscape irrigation and recycling programs are examples of mitigation measures that require administrative action to implement during the life of the project. This type of mitigation measure is often implemented through administrative action in operation contracts, leases, creation of associations and covenants and agreements. These types of mitigation measures often require implementation.

Generally, the monitoring of the implementation of mitigation measures occurs during and at the completion of the implementation phase, prior to the commencement of the next phase of

the development process. For example, those mitigation measures implemented in the design phase of the project will be monitored during and at the end of the design phase, prior to commencement of the construction phase of development. Those measures implemented in the construction phase through the incorporation of mitigation measures into construction contract documents are monitored prior to the start of construction activities and during the construction activities. Prior to the start of construction activities, a monitoring check will be completed to assure that the contract documents include all necessary mitigation provisions. The on-site monitoring of mitigation measures will also occur during the construction activities. Construction phase project monitoring checklists and signature sheets will be utilized by construction managers and foremen to assure that appropriate implementation, as well as timely monitoring, have taken place.

The timing of monitoring for mitigation measures to be implemented through administrative action will vary depending on the nature of the measure.

MONITORING/MONITORING TEAM

Monitoring reports will be prepared by a single Monitor firm, retained by the Applicant in consultation with professionals corresponding to the mitigation measure being monitored. Individual technicians will not submit reports to the City directly. They shall be collected by the Monitor and submitted to the City as part of a complete Annual Mitigation Monitoring Report.

ENFORCEMENT

Under CEQA, the ultimate responsibility for making determinations with respect to potential environmental effects rests with the lead agency rather than the Monitor or preparer of the EIR.

Mitigation Monitoring provisions under CEQA do not grant monitors or agencies any additional police powers to enforce compliance with mitigation measures. The Mitigation Measures Report is an informational document upon which the City, its departments, and agencies may act to enforce compliance. The Monitor will act as a reporter of information on compliance based on the terms set forth in this Mitigation Monitoring Program. If a failure to mitigate or comply with mitigation measures is reported by the Monitor, the City may act to require correction of such failure, but in no case shall the Monitor have the authority nor obligation to enforce the mitigation set forth herein.

The City and other enforcement agencies may not require the use of alternative means to mitigate adverse effects of the project if a mitigation measure proves to be ineffective unless such alternative measures are provided for in the EIR. Ineffective mitigation measures may be eliminated from future mitigation packages for subsequent phases of the project that may generate similar adverse effects on the environment.

PROGRAM MODIFICATION

After review and approval by the lead agency, minor changes to the Mitigation Monitoring Program are permitted but can only be made by the Applicant with the approval of the Director of Planning. This flexibility is necessary in light of the prototype nature of the program and the need to protect the environment with a workable program. No changes will be permitted unless the Mitigation Monitoring Program continues to satisfy the requirements of Section 21081.6 of the California Environmental Quality Act as determined by the Director of Planning.

The draft Mitigation Monitoring program is presented herein. Each required mitigation measure is listed and categorized by impact area, with an accompanying identification of:

- Responsibility for implementation;
- Monitoring phase of the project during which the measure should be monitored:
    - Design/Pre-construction,
    - Construction, and/or
    - Occupancy;
- Enforcement agency; and
- Monitoring agency.

The project Applicant shall demonstrate compliance with each mitigation measure in a written report submitted to the applicable enforcement agency prior to issuance of a Building Permit or Certificate of Occupancy, and, as applicable, provide periodic reports regarding compliance with such conditions.

ENVIRONMENTAL IMPACT MITIGATION MEASURES

A. 1. GRADING

1. All grading shall be accomplished under the observation and testing of the project geotechnical engineer and engineering geologist in accordance with the current Grading Ordinance of the City of Los Angeles.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

2. Prior to grading, the areas proposed for development shall be stripped and cleared of all existing vegetation, debris, and other deleterious materials. These materials shall be disposed of off-site.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

3. During site clearing, earthwork and grading shall be protected from flooding, ponding or inundation from poor or improper surface drainage. Temporary provisions shall be made at all times to adequately direct surface drainage from all sources on and off the work site.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

4. Following excavation of the overburden materials, the exposed grade shall then be scarified to a depth of six inches, moistened to optimum content, and placed at a minimum selective compaction of 92 percent as determined in accordance with ASTM Test Method: D-1557-91.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

5. Fill, consisting of soil approved by the soils engineer, shall be placed horizontally in compacted layers with suitable compaction equipment. The inert debris, such as concrete, shall be utilized in the deeper portions of compacted fills and a minimum of 15 feet from the face of the westerly facing slope. Fill shall be observed by the soils engineer prior to use in fill areas. Rocks larger than four inches shall not be used in the fill.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction,Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

6. The fill shall be compacted to at least 92 percent of the maximum laboratory density for the material used. The maximum density shall be determined by ASTM Test Method: D-1557-91 or equivalent.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

7. Field observation and testing shall be performed by the soils engineer during grading to assist the contractor in obtaining the required degree of compaction and the proper moisture content. Where compaction is less than required, additional compactive effort shall be made with adjustment of the moisture content, as necessary, until 92 percent compaction is obtained.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

8. All areas to be developed within the project shall have a minimum of three feet of approved compacted fill below the projected finished grade.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety Cultural Heritage Commission

9. Fill slopes shall not generally exceed a 2:1 gradient. Compacted fill shall be keyed and benched into terrace of Pleistocene sediments. Keyways shall be a minimum of 12 feet wide and three feet into sound material as measured on the downhill side. Subdrains shall be required on the base of all fills in the axis of drainage courses.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

10. Cut slopes shall not exceed a 2:1 gradient.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

11. The grading plan shall be reviewed by the Departments of Building and Safety, and Public Works for adherence to City Guidelines.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Cultural Heritage Commission
Monitoring Agency:	Department of Building and Safety/ Department of Public Works

12. The design of foundations, retaining walls, floor slabs, decking and paving shall be in conformance with recommendations of the engineering consultants study performed by Pacific Soils Engineering, Inc. (included as Appendix C).

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

13. In accordance with the provisions of the Coastal Bluffs Specific Plan, there shall be no grading, import or export, or movement on a site of more than 10 cubic yards of dirt, without approval of a soils and geology report. This report shall include:

- A run-off and drainage control plan, a slope protection plan and an erosion protection plan.

- The report shall include methods of protection, control and restorative work as necessary, and shall be prepared by a soils engineer (as defined in LAMC Section 91.0420) and an engineering geologist certified by the State of California, and address potential earthquake hazards.

- The slope protection plan and erosion restoration plan shall be prepared in collaboration with a landscape architect.

- Prior to issuance of any grading or building permit, all building plans shall be signed by the preparer of the soils and geology report certifying that all necessary recommendations for grading, slope protection, foundations, erosion restoration, retaining walls and drainage made in the report have been incorporated into the development.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

14. Sediment basins will be required on any area which has a slope equal to or steeper than 1.5:1 (66.7 percent). These devices shall be required prior to or concurrent with the

initial soil disturbance and maintained through the development process to minimize sediment from run-off waters or gravity flow during construction.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

15. No grading permit shall be issued until the Department of Building and Safety has performed a grading pre-inspection report to determine that there has been no unpermitted or illegal dumping or grading on the site.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

16. No grading of property shall be permitted from November 1st to April 15th inclusive unless erosion control plans have been submitted to and approved by the Department of Building and Safety prior to the issuance of a building permit.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

17. The Applicant shall comply with the Best Management Practices for storm water quality. These practices shall be in compliance with Order No. 96-054, National Pollutant Discharge Elimination System (NPDES), Permit CAS614001 issued by the Regional Water Quality Control Board (RWQCB) to the County of Los Angeles and local agencies.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

18. An interest bearing account shall be established by the developer that would defray the City's cost of occasional mobilization to clean debris and erosion damage along Cabora Drive. In addition, the City may require a small debris wall (two to three feet high) be constructed at the toe of the natural slope to intercept and retain eroded soils to help maintain access between maintenance activities.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

In addition to the above mitigation and code compliance measures, the following measure is recommended, if required by the Department of Building and Safety, to further stabilize the natural slope:

19. Existing erosional features along the bluff face would be removed and replaced with a manufactured slope. This manufactured slope would be constructed at the natural gradient of the bluff face and would be reinforced with the aid of geofabrics (e.g., Tensar, etc.).

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

The following measure has been added by the project Applicant in order to minimize construction impacts:

20. The Applicant shall provide to all project construction contractors a copy of the Applicant's Required Construction Practices for the West Bluffs Project (see Appendix B of the Subsequent Final EIR). These practices shall be adhered to during project construction.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

A. 2. GEOLOGIC HAZARDS/SEISMICITY

1. The project shall be designed and built to sustain the effects of both the maximum credible and maximum probable groundshaking effects of an earthquake in conformance with the City of Los Angeles Seismic Safety plan, applicable portions of the Municipal Code and seismic safety requirements of the Department of Building and Safety, which include Division 23, Section 91.2305 (earthquake regulations) of the City of Los Angeles Building Code.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

2. The structural design of the buildings shall be in conformance with the recommendations included in geotechnical reports-prepared for the project and approved by the Department of Building and Safety. The information about ground motion included in the project geotechnical report shall be used as input for the seismic design of buildings.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

3. The project shall conform to criteria set forth in the Recommended Lateral Force Requirements and Commentary by the Structural Engineers Association of California.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

B. 1. AIR QUALITY

Construction

Land Clearing/Earth-Moving

1. The Applicant shall secure any necessary permits from the SCAQMD, including an approved fugitive dust emissions control plan pursuant to SCAQMD Rule 403.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

2. Non-toxic soil stabilizers shall be applied according to manufacturers' specifications or vegetation shall be planted on all inactive construction areas (previously graded areas inactive for 10 days or more and not scheduled for additional construction activities within 12 months, to the extent feasible).

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

3. Exposed pits (i.e., gravel, soil, dirt) with 5 percent or greater silt content shall be watered twice daily, enclosed, covered or treated with non-toxic soil stabilizers according to manufacturers' specifications.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

4. All other active sites shall be watered at least twice daily.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

5. All grading activities shall cease during second stage smog alerts and periods of high winds (i.e., greater than 25 mph) if dust is being transported to off-site locations and cannot be controlled by watering.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

6. All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer).

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

7. A construction relations officer shall be established by the Applicant to act as a community liaison concerning on-site construction activity, including resolution of issues related to fugitive dust generation.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

Paved Roads

8. All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite, or shall be paved.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

9. Streets shall be swept hourly if visible soil material has been carried onto adjacent public paved roads (reclaimed water shall be used if available.)

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

10. Construction equipment shall be inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

Unpaved Roads

11. Water or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

12. Traffic speeds on all unpaved roads shall not exceed 15 mph.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

B. 2 METEOROLOGY (WIND EFFECT)

This environmental issue was determined not significant in the Initial Study.

C. 1. SURFACE WATER RUNOFF/HYDROLOGY

1. The design of the on-site storm water drainage system shall be submitted to the City Engineer for review and approval prior to development of any drainage system improvements.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Bureau of Engineering
Monitoring Agency:	Department of Building and Safety/ Bureau of Engineering

2. All proposed drainage improvements shall meet applicable requirements from the Department of Building and Safety and other responsible agencies.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety/ Bureau of Engineering
Monitoring Agency:	Department of Building and Safety/ Bureau of Engineering

3. The project shall comply with applicable provisions of the Flood Hazard Management Specific Plan Ordinance (No. 154,405).

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety/ Bureau of Engineering
Monitoring Agency:	Department of Building and Safety/ Bureau of Engineering

4. The following Best Management Practices shall be implemented:

- To absorb oil and grease present in storm water runoff catch basin filters will be installed on the 13 on-site and 5 off-site catch basins.

- A catch basin maintenance program will be developed and approved by the City of Los Angeles' Storm Water Management Division. The program will include provisions for periodic inspections, debris removal, local area cleanup, and replacement of filter materials. In addition, the program will include a funding mechanism.

- Catch basin maintenance program will coordinate with the Storm Water Management Division on the placement of "No Dumping" or "Drains to the Wetlands" signs at all the catch basins on-site.

- Information regarding the city's mobile collection program, or a stationary collection site if the city has one in the area or businesses in the area certified to take in household hazardous waste shall be given to new home buyers by the homebuilder at the time of new home purchase.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety/ Bureau of Engineering
Monitoring Agency:	Department of Building and Safety/ Bureau of Engineering

C.2. GROUND WATER

This environmental issue was determined not significant in the Initial Study.

C.3. FLOOD HAZARD/MUDFLOW HAZARD

This environmental issue was determined not significant in the Initial Study.

D. PLANT LIFE AND ANIMAL LIFE

CDFG Mitigation Measures

1. The Applicant shall be responsible for habitat enhancement to existing Diegan sage scrub habitat and removal of exotic vegetation on the bluff face below the project area. The mitigation area shall be comprised of no less than 0.90 acres, which represents a mitigation ratio of 5:1. As established by CDFG policy, the location of the mitigation area and precise restoration requirements shall be coordinated between responsible and trustee agencies following certification of the EIR. However, the mitigation program shall be developed by a qualified biologist and/or restoration specialist and shall follow accepted standards for exotic plan removal and native habitat enhancement. The mitigation program shall be developed in coordination with the Friends of the Ballona Wetlands and implemented in such a way so as not to adversely impact planned restoration of the freshwater marsh and riparian corridor under the First Phase of the Playa Vista project.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	California Department of Fish and Game
Monitoring Agency:	California Department of Fish and Game

Corps Mitigation Measures

2. The mitigation required for the discharge of fill materials into jurisdictional waters of the United States will be determined by the Corps during the Section 404 Nationwide Permit process. The mitigation requirements would be developed by the Corps in cooperation with CDFG and the USFWS. The Applicant would be responsible for the development of a mitigation plan in accordance with the Corps' Mitigation and Monitoring Guidelines and would include those measures required by CDFG.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	United States Army Corps of Engineers
Monitoring Agency:	United States Army Corps of Engineers

General Mitigation Measures

3. Temporary fencing, stakes, flags or other markers shall be erected around bluff areas intended for preservation to establish the limits of grading and construction-related disturbance.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

4. Construction personnel shall be briefed in the field regarding presence of protected bluff areas and prohibitions against operation or storage of construction equipment near or in such areas, except as necessary to access bluff faces to effect erosion or slope control.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

5. Construction site access shall be routed so as to avoid protected bluff areas and the Ballona Wetlands. All construction activity and vehicular traffic generated by the proposed project shall be limited to areas targeted to be graded for construction or erosion and slope control.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

6. No dumping of trash or storage of construction materials shall occur within protected bluff areas or at the base of the bluffs.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

7. Refueling and maintenance of construction vehicles shall be conducted away from drainages, bluff faces and wetland areas at the base of bluffs, and shall be restricted to areas designated for refueling and maintenance. All such areas shall be protected by temporary berms to contain any potential spill.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

8. Landscaping of the open space lots shall be with native plants typically found associated with or adjacent to coastal sage scrub habitats. Plant species selected shall include appropriate species currently found on the site and those species that historically were present on the site.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of City Planning

9. Landscape plans for the remainder of the project site, including plans for single-family dwellings, shall be subject to review by the City Planning Department, in accordance with Section 12.40 of the City of Los Angeles Planning and Zoning Code.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of City Planning

10. All lots backing up to protected bluff areas shall be fenced to minimize opportunities for intrusion into protected bluff areas by humans or domestic pets. No direct access to bluff face open space lots shall be permitted for project residents except as provided by designated trail access.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Construction, Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of City Planning

11. Erosion control measures to be employed during construction shall include rapid revegetation, sand bagging, use of straw bales or temporary sedimentation basins to control the potential for sediment impacts to the Ballona Wetlands, and the riparian corridor during all stages of project construction.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

E. ANIMAL LIFE

This environmental issue is evaluated in Section IV.D., Plant and Animal Life.

F. NOISE (CONSTRUCTION, MOBILE, AND STATIONARY)

1. Structural construction work shall be limited to the hours of 7:00 A.M. - 6:00 P.M. Monday-Friday and 8:00 A.M. - 6:00 P.M. Saturday.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety/ Department of City Planning
Monitoring Agency: Department of Building and Safety/ Department of City Planning

2. Construction contracts shall require project contractors to use power construction equipment with noise shielding and muffling devices.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction

Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

3. During construction, the project shall comply with applicable LAMC Section 112.03 (City Noise Ordinance Number 144,331) and its subsequent ordinances.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

4. Where construction activity occurs within 500 feet of residences, temporary noise walls shall be erected between the project site and the residences.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

G. LIGHT AND GLARE

This environmental issue was determined not significant in the Initial Study.

H. LAND USE

Since the proposed project would not have a significant impact on land use, no mitigation measures are recommended or required.

I. NATURAL RESOURCES

This environmental issue was determined not significant in the Initial Study.

J. RISK OF UPSET/HUMAN HEALTH

This environmental issue was determined not significant in the Initial Study.

K. POPULATION

This environmental issue is evaluated in Section IV.L., Population and Housing.

L. POPULATION AND HOUSING

Since the proposed project would not have a significant impact on population and housing, no mitigation measures are recommended or required.

M. RIGHT OF WAY AND ACCESS

This environmental issue is evaluated in Section IV.N.1, Traffic and Access.

N. 1. TRAFFIC AND ACCESS

1. The project developer shall obtain haul route approval for all excavated materials from the City Department of Building and Safety. No transport of excavated materials shall be permitted on roads less than a secondary highway.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

2. One flag person shall be required at the project site and dump site to assist the trucks in and out of the area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

3. Neighborhood Traffic Intrusion Program: The project shall also implement a comprehensive Neighborhood Traffic Intrusion Program for the area bounded generally by the project site on the north, Lincoln Boulevard on the east, Manchester Avenue on the south, and generally Gulana Avenue on the west. Measures within this area could include

corridor level improvements to Manchester Avenue and Lincoln Boulevard, such as traffic signal coordination, turn restrictions at local street intersections, and additional turning lanes at the intersection of Manchester Avenue and Lincoln Boulevard, to make these facilities more attractive to traffic. Additional measures within the neighborhood itself could include additional stop signs, speed humps, and/or traffic circles to further increase the attractiveness and safety of the neighborhood. Detailed discussions of such a program, and its effects on traffic in and around the project site are currently under consideration and shall be designed in accordance with LADOT requirements.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Occupancy, Post-Occupancy
Enforcement Agency:	Department of Transportation
Monitoring Agency:	Department of City Planning

4. Construction-related traffic shall access the project site via "A" Street, whenever possible, once it is constructed. Further, construction vehicles shall park within the project site, whenever possible.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

5. The Applicant is working with Caltrans in the design of the necessary roadway dedications and improvements along the Lincoln Boulevard frontage of the site.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Occupancy, Post-Occupancy
Enforcement Agency:	California and City of Los Angeles Departments of Transportation
Monitoring Agency:	Department of City Planning

N.2. PARKING

This environmental issue is evaluated in Section IV.N.1, Traffic and Access.

N.3. ACCESS

This environmental issue is evaluated in Section IV.N.1, Traffic and Access.

O. 1. FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES

1. The project shall comply with all applicable state and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (C.P.C. 19708).

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of City Planning/Fire Department
Monitoring Agency: Department of City Planning/Fire Department

2. Emergency access shall be via: (1) the project entry road, "A" Street, which will connect Lincoln Boulevard to "B" Street and the rest of the project internal street system, and (2) via a 20-foot wide gated emergency access driveway constructed to City of Los Angeles standards, which will permit emergency vehicle access to the project from the existing residential street system between Berger Avenue and the "E" Street cul-de-sac.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of City Planning/Fire Department
Monitoring Agency: Department of City Planning/Fire Department

3. Plot plans shall be submitted indicating access road and turning area for Fire Department approval.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of City Planning/Fire Department
Monitoring Agency: Department of City Planning/Fire Department

4. Private development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works

5. The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of City Planning/Fire Department
Monitoring Agency: Department of City Planning/Fire Department

6. Fire lanes, where required, and dead-ending streets shall terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane shall be greater than 700 feet in length without a secondary access being provided.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of City Planning/Fire Department
Monitoring Agency: Department of City Planning/Fire Department

7. On-site hydrants may be required after review of plot plans.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of City Planning/Fire Department
Monitoring Agency: Department of City Planning/Fire Department

O. 2. POLICE PROTECTION

1. The Applicant shall contact the Police Department's Crime Prevention Section for advisement on crime prevention features that could be incorporated into the design of this project, including Neighborhood Watch.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Police Department
Monitoring Agency: Police Department

2. Prior to recordation of the Final Tract Map, the Applicant shall provide the Pacific Area Commanding Officer with a diagram of the project, including access routes, addresses, and any information that might facilitate police response.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Police Department
Monitoring Agency: Police Department

3. The Applicant shall install street lighting on all streets within the subdivision.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning/Police Department

4. Emergency access shall be via: (1) the project entry road, "A" Street, which will connect Lincoln Boulevard to "B" Street and the rest of the project internal street system, and (2) via a 20-foot wide gated emergency access driveway constructed to City of Los Angeles standards, which will permit emergency vehicle access to the project from the existing residential street system between Berger Avenue and the "E" Street cul-de-sac.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Transportation/ Department of Public Works
Monitoring Agency: Department of City Planning/Police Department

O. 3. SCHOOLS

1. The Applicant shall pay developer fees, as required under Section 65995 of the California Code, for school improvements.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of City Planning/ Los Angeles Unified School District
Monitoring Agency:	Department of City Planning/ Los Angeles Unified School District

O. 4. PARKS AND RECREATION

1. The Applicant shall conform with city park requirements of Section 17.12 of the City of Los Angeles Planning and Zoning Code by land dedication, the provision of private park space for residents, payment of in-lieu fees, or a combination thereof.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of City Planning/ Department of Building and Safety
Monitoring Agency:	Department of City Planning

O. 5. LIBRARIES

1. City implementation of the proposed expansion plans for the Loyola Village Branch Library would reduce project impacts on library services to less than significant. The Applicant shall provide a fair share payment toward the cost of such planned expansion.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Occupancy
Enforcement Agency:	Department of City Planning/ Los Angeles Public Library
Monitoring Agency:	Department of City Planning

P. ENERGY CONSERVATION

1. Project built-in appliances, refrigerators, and space-conditioning equipment should exceed the minimum efficiency levels mandated in the California Code of Regulations.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

2. Project buildings shall be designed and constructed to be well-sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

3. A performance check of the installed space-conditioning system shall be completed by the developer/installer prior to issuance of the certificate of occupancy to ensure that energy-efficiency measures incorporated into the project operate as designed.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

4. Exterior walls shall be finished with light-colored materials and high-emissivity characteristics to reduce cooling loads. Interior walls shall be finished with light colored materials to reflect more light and, thus increase lighting efficiency.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

5. Thermal insulation which exceeds requirements established by the California Code of Regulations shall be installed in walls and ceilings.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Construction

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

6. Window systems shall be designed to reduce thermal gain and loss, thus, reducing cooling loads during warm weather and heating loads during cool weather.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

7. Install fluorescent and high-intensity-discharge (HID) lamps, which give the highest light output per watt of electricity consumed, wherever possible including all street and parking lot lighting to reduce electricity consumption.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

8. Project structures shall be designed such that natural ventilation may be utilized, wherever possible.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

9. The project shall comply with Section 66473.1 of the State Subdivision Map Act which requires that the design of new subdivisions "provide, to the extent feasible, for future passive or natural heating and cooling opportunities."

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning

Q.1. POWER

This environmental issue is evaluated in Section IV.P., Energy Conservation.

Q.2. NATURAL GAS

This environmental issue is evaluated in Section IV.P., Energy Conservation.

Q.3. COMMUNICATION SYSTEMS

This environmental issue was determined not significant in the Initial Study.

Q. 4. WATER CONSERVATION

1. Pipes and installation shall meet City of Los Angeles Department of Water and Power specifications and American Water Works Association standards.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety/ Department of Public Works
Monitoring Agency:	Department of Building and Safety/ Department of Public Works

2. The project developer shall install low flush toilets and low flow showerheads.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

3. Plumbing fixtures shall be selected which reduce potential water loss from leakage due to excessive wear of washers.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

4. The project shall comply with Xeriscape Ordinance No. 165,004, Water Conservation Ordinance No. 166,080, their subsequent ordinances, and all other applicable local and state regulations.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction, Post-Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

5. Pressure regulators shall be required in accordance with the Los Angeles City Plumbing Code for lots where pressures exceed 80 pounds per square inch (psi) at the building site elevation.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

6. New fire hydrants and/or top upgrades to existing fire hydrants shall be required in accordance with the Los Angeles Fire Code.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety/Fire Department
Monitoring Agency: Department of Building and Safety/Fire Department

7. Water-conserving measures in landscape management shall include:

- Use of warm season grasses if lawn is planted.
- Plants of similar water use grouped to reduce over-irrigation of low-water using plants.
- Extensive use of mulch in all landscaped areas.
- Installation of efficient irrigation systems that minimize runoff and evaporation and maximize the water that will reach the plant roots. Setting

of automatic irrigation systems to insure irrigation during early morning or evening hours. Resetting of automatic irrigation system to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction, Post-Occupancy
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning

Q. 5. SEWERS

1. The project developer shall comply with the provisions of Ordinance No. 166,060 or subsequent ordinances regarding sewer capacity allotment in the City of Los Angeles.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of City Planning

2. The project developer shall comply with Ordinance No. 166,080 which requires that water saving devices be installed in all commercial, industrial and residential structures.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

3. Design and construction of additional local sewers and/or house connection laterals shall be subject to approval from the Bureau of Engineering.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering

4. Sewage discharged from the project shall be disposed of in accordance with the requirements of the State Regional Water Quality Control Board.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction, Post-Occupancy
Enforcement Agency: State Regional Water Quality Control Board/ Bureau of Engineering
Monitoring Agency: State Regional Water Quality Control Board/ Bureau of Engineering

Q.6. STORM WATER DRAINAGE

This environmental issue is evaluated in Section IV.C.1, Surface Water Runoff/Hydrology.

Q. 7. SOLID WASTE

1. All dwellings shall include built-in storage and sorting space for recyclable materials so that future residents will more easily be able to participate in curbside pick-up programs.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction, Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Public Works

2. An educational/outreach program for initial project residents shall be provided outlining city regulations and project rules and penalties, locations of recycling facilities, and instructions on how to separate and prepare materials for recycling.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Occupancy
Enforcement Agency: Department of Public Works
Monitoring Agency: Department of Public Works

R. SAFETY

This environmental issue was determined not significant in the Initial Study.

S. AESTHETICS AND VIEWS

1. Preservation of the open space lots (Lots 119 through 129) shall be established by covenant and agreement.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction, Occupancy
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning

2. Residential Lots 1 through 26 shall be set back from the bluff edge a minimum of 15 feet from a 2:1 projection line up from Cabora Drive (as defined by the approved grading plan) in addition to the code required minimum building setback. With the exception of handrails on the bluff trail, fences shall be prohibited on the face of the bluff.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction, Occupancy
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

3. The materials used on the elevated section of the bluff trail shall be chosen to blend with the vegetation and match the coloration of the bluff.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

4. Wherever possible, down drains shall be either underground systems, or, if at ground level, curved to present a more natural appearance.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

5. A detailed landscaping plan and program for remaining open space areas shall be prepared by a qualified landscape architect and submitted to the Advisory Agency for review and approval.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction, Occupancy
Enforcement Agency:	Department of City Planning
Monitoring Agency:	Department of City Planning

6. The project shall include a trail system and a view park to allow individuals access to views of the plain below, and cityscape and mountains to the north of the project site.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of City Planning
Monitoring Agency:	Department of City Planning

7. All lighting shall be directed onto the site. Subject to the illumination provisions of the Uniform Building Code, "cut off" street lighting fixtures shall be used throughout to minimize the impact of views of, from, and over the site after dark to less than significance.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

8. New telephone and power lines shall be placed underground and all existing above ground lines on the project site shall be replaced with underground lines.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Department of Building and Safety

9. A building height limit of 35 feet will be imposed by deed restriction, which is ten feet below the City requirement.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction, Operation
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning

T. 1. ARCHAEOLOGICAL RESOURCES

Discovery

1. Prior to earth disturbing activities, a non invasive map of potential cultural features shall be created through the use of remote sensing techniques. At a minimum, a sample of the anomalies identified through remote sensing will be tested through manual and/or mechanical excavation. A list of feature types and their probable location will then be generated. Feature types that meet CEQA criteria of "unique" or "important" will be identified and targeted for excavation.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction
Enforcement Agency: Department of City Planning
Monitoring Agency: Department of City Planning

2. Even with the remote sensing results, it is possible that additional cultural features will be discovered during grading and construction. All on-site grading operations shall be monitored by a professional archaeologist and Native American. The Native American monitor will be selected from a list of suitable candidates obtained from the Native American Heritage Commission. In the event of notification by the project archaeologist that a potentially significant or unique find has been unearthed, there shall be no further excavation or disturbance of the location until the geographic extent and scientific value of the resource can be reasonably verified.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Assigned Project Archaeologist and Native American/ Department of City Planning

Excavation

3. Feature types targeted for excavation include: caches, pit ovens and earth ovens. Another type, hearths, are common throughout southern California and shall be mapped, but not excavated unless there is demonstrated potential to yield data on site chronology or subsistence practices.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Assigned Project Archaeologist and Native American/ Department of City Planning

4. Any excavation of identified features shall be preformed manually using standard archaeological techniques. Excavations shall be conducted by professional archaeologist and monitored by an appropriate Native American monitor.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Assigned Project Archaeologist and Native American/ Department of City Planning

5. In the event that human remains and grave goods are discovered during the monitoring program, there shall be no further excavation or disturbance of the site where such remains are discovered, nor shall there be any disposition of such human remains and grave goods, other than in accordance with the procedures and requirements set forth in California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Excavation or disturbance may continue in other areas of the project site that are not reasonably suspected to overlie adjacent remains.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Assigned Project Archaeologist and Native American/ Department of City Planning

Reporting

6. All grading and construction plans shall be clearly imprinted with all the archaeological mitigation measures. All site workers shall be informed in writing by the on-site archaeologist of the restrictions regarding disturbance and removal as well as procedures to follow should a resource deposit be detected.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Assigned Project Archaeologist and Native American/ Department of City Planning

7. Upon completion of earth disturbing activities, the archaeological monitor shall prepare a report. The report shall include the results of the fieldwork and all appropriate laboratory and analytical studies that were performed in conjunction with feature excavation. The report shall be submitted in draft form to the City of Los Angeles. City representatives will have 30 days to comment on the report. All comments and concerns shall be addressed in a final report issued within 30 days of receipt of city comments.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Assigned Project Archaeologist and Native American/ Department of City Planning

Curation

8. All artifacts, notes, photographs, and other project-related materials recovered during the monitoring program shall be curated at a facility meeting federal and state standards.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction, Construction

Enforcement Agency: Department of Building and Safety
Monitoring Agency: Assigned Project Archaeologist and Native American/ Department of City Planning

T. 2. PALEONTOLOGICAL RESOURCES

1. A qualified paleontologist shall be retained to perform a preconstruction salvage effort to salvage any significant exposed fossils.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Assigned Project Paleontologist/ Department of City Planning

2. A qualified palaeontologist shall be present on site during all excavations that encounter or are likely to encounter the Palos Verdes Sand. This paleontologist shall be able to divert, direct, or halt grading activities until all evaluation and salvage of exposed fossils is completed. Because of the potential for microvertebrate fossils during excavation within Palos Verdes Sand, the palaeontologist shall direct the collection of matrix samples for processing through fine meshed screens.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Assigned Project Paleontologist/ Department of City Planning

3. Grading into the dune/terrace deposits shall be monitored periodically; the duration of these visits shall depend on the rate of excavation and the abundance of fossils.

Responsibility for Implementation: Project Applicant
Monitoring Phase: Pre-Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Assigned Project Paleontologist/ Department of City Planning

4. Prior to being deposited in the finial repository, all fossils shall be prepared to the point of identification, cataloged, and curated.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Assigned Project Paleontologist/ Department of City Planning

5. A final report shall be filed with the repository and the lead agency upon completion of all field and laboratory work.

Responsibility for Implementation:	Project Applicant
Monitoring Phase:	Pre-Construction, Construction
Enforcement Agency:	Department of Building and Safety
Monitoring Agency:	Assigned Project Paleontologist/ Department of City Planning

Appendix B
Applicant's Required Construction Practices for the West Bluffs Project

APPENDIX B
APPLICANT'S REQUIRED CONSTRUCTION PRACTICES FOR THE WEST BLUFFS PROJECT

General Construction Activities

- All City of Los Angeles applicable ordinances will be followed.
- A security guard will be present during construction activities to ensure safety and security of the project site.
- Construction traffic will use "A" Street (once constructed) to access the project site, whenever possible.
- Construction-related vehicles will park within the project site, whenever possible.
- Streets impacted by construction activities (Rayford Drive, Colegio Drive, 80th Street, 79th Street and Berger Avenue) will be washed as necessary, but not less than twice per week, during grading and home construction along 80th Street. During the remaining construction activities, impacted streets will be washed as necessary, but not less than every other week.
- Streets impacted by construction activities (Rayford Drive, Colegio Drive, 80th Street, 79th Street and Berger Avenue) will be swept on alternate watering days as necessary, but not less than twice per week, during grading and home construction along 80th Street. During the remaining construction activities, impacted streets will be swept as necessary, but not less than every other week.
- Signs will be posted within the project site prohibiting: (1) the use of drugs and alcohol on-site; (2) dogs on the project site; (3) unauthorized personnel on-site; and (4) loud music. Signs will also be posted indicating construction work hours.

Grading/Infrastructure Completion

- Grading will be completed in a manner that minimizes truck access from existing residential streets, whenever possible.

- Dust will be minimized during grading operations, at least two times daily, with the use of a water truck.
- A temporary screen fence will be installed along 80th Street to minimize dust and visual impacts.
- All project material transported off-site will either be sufficiently watered or securely covered to prevent excessive amounts of dust.

Home Construction

- Homes along 80th Street will be built as part of the first phase of the project.
- Construction lighting will be designed to minimize impacts on adjacent residences.
- The project site will be kept in a neat and orderly manner.

Community Outreach Program

- A 24-hour "Hot Line" will be available to residents regarding potential concerns/problems with construction activities.
- A vermin abatement program will be submitted to the community for input, prior to construction activities.
- All adjacent residents will be notified (in writing) regarding the construction schedule, prior to commencement of grading activities.
- Residents of 80th Street, Rayford Drive, Colegio Drive and Berger Avenue will receive car wash certificates weekly, during grading activities.
- Residents of 80th Street, Rayford Drive, Colegio Drive and Berger Avenue will receive certificates for housecleaning (two per year), during grading activities and construction of the homes along 80th Street.

Appendix C
Air Quality Analysis Data

West Bluffs

PM10 Emissions

Emission Factor	1.2	tons/acre/month of PM10
Daily Emissions	107	lbs/acre/day of PM10
Number of acres worked/day	5	
Daily Emissions	535	lbs of PM10

	Construction Employee Trips	Haul Trips
Vehicles	75	200
Trip Distance	10.17	0.25
Trips	150	400

Emission Factors	CO (gm/mile)	ROG (gm/mile)	Diurnal (gm/veh)	Resting (gm/veh)	Soak (gm/trp)	Nox (gm/mile)	PM10 (gm/mile)
200 Highway Trucks	10.61	2.55	0	0	0	10.61	1.3
Worker passenger vehicles	17.67	0.92	0.69	0.31	0.42	0.91	0.01

Emissions (lbs/day)	CO	ROG	Diurnal	Resting	Soak	Nox	PM10
200 Highway Trucks	2.3	0.6	-	-	-	2.3	0.3
Worker passenger vehicles	59.4	3.1	0.1	0.1	0.1	3.1	0.0
Total Road Vehicle Emissions	62	4	0	0	0	5	0

Equipment emissions	Vehicle/day	Hours/day	Emissions Factor (lbs/hour) CO	ROC	Nox	PM10	Sox
Off Highway Truck	0	10	1.8	0.19	4.17	0.26	0.45
Scraper	4	10	1.25	0.27	3.84	0.41	0.46
Grader	1	10	0.151	0.039	0.713	0.061	0.086
Excavator	0	10	0.011	0.001	0.024	0.0015	0.002
Backhoe	1	10	0.015	0.003	0.022	0.001	0.002
Loader	2	10	0.011	0.002	0.023	0.0015	0.002
	Horse Power	Load Factor	Emissions (lbs/day)				
Off Highway Truck			0	0	0	0	0
Scraper			50	10.8	153.6	16.4	18.4
Grader			1.51	0.39	7.13	0.61	0.86
Excavator	428	80%	0	0	0	0	0
Backhoe			0.15	0.03	0.22	0.01	0.02
Loader			0.22	0.04	0.46	0.03	0.04

Demolition Construction Emissions (lbs/day)

Project	CO	ROG	NOx	PM10	SOx
Fugitive Dust				535	
Road Vehicle Emissions	62	4	5	0	0
Const Equip Emissions	52	11	161	17	19
Total Project	**114**	**15**	**166**	**552**	**19**
SCAQMD Threshold	**550**	**75**	**100**	**150**	**150**
Difference	(436)	(60)	66	402	(131)
Significant?	NO	NO	YES	YES	NO
Quarterly Emissions (tons/quarter)	**3.85**	**0.51**	**5.6**	**18.63**	**0.64**
SCAQMD Threshold	**24.75**	**2.50**	**2.50**	**6.75**	**6.75**
Difference	(20.90)	(1.99)	3.10	11.88	(6.11)
Significant?	NO	NO	YES	YES	NO

West Bluffs
Electric and Natural Gas Usage

Land Use	1,000 Sqft	Electricity Usage Rate (kWh\sq.ft\yr)	Total Usage (KWh\year)	(MWh\Day)
Existing				
Office	5	12.95	64,750	0.177
Multi-Plex	36	13.55	487,800	1.336
Total			552,550	1.514
Project				
Retail	302	13.55	4,092,100	11.211
Restaurant	100	47.45	4,745,000	13.000
Broadcast Studio	20	12.95	259,000	0.710
Ballroom	35	9.95	348,250	0.954
Live Entertainment	60	9.95	597,000	1.636
Live Theatre	260	9.95	2,587,000	7.088
Multi-Plex	100	13.55	1,355,000	3.712
Hotel	130	9.95	1,293,500	3.544
Total			15,276,850	41.854
Net				

Emission Factors (lbs/MWh)

CO	ROC	NOx	PM10	SOx
0.2	0.01	1.15	0.04	0.12
Emissions from Electricity Consumption (lbs/day)				
0.035	0	0.04		
0.267	0.013	1.537	0.053	0.16
0.303	**0.015**	**1.741**	**0.061**	**0.182**
2.242	0.112	12.893	0.448	1.345
2.6	0.13	14.95	0.52	1.56
0.142	0.007	0.816	0.028	0.085
0.191	0.01	1.097	0.038	0.114
0.327	0.016	1.881	0.065	0.196
1.418	0.071	8.151	0.284	0.851
0.742	0.037	4.269	0.148	0.445
0.709	0.035	4.075	0.142	0.425
8.371	0.419	48.133	1.674	5.023
8.068	**0.404**	**46.392**	**1.613**	**4.841**

Land Use	1,000 Sqft	Nat Gas Usage Rate (cu.ft\sq.ft\mo)	Total Natural Gas Usage (cu.ft\mo)	(cu.ft\DAY)
Existing				
Office	5	2	10,000	333
Multi-Plex	36	2.9	29,441	981
Total			39,441	1,315
Project				
Retail	302	2.9	875,800	29,193
Restaurant	100	2.9	290,000	9,667
Broadcast Studio	20	2.9	58,000	1,933
Ballroom	35	2.9	101,500	3,383
Live Entertainment	60	2.9	174,000	5,800
Live Theatre	260	2.9	754,000	25,133
Multi-Plex	100	2.9	290,000	9,667
Hotel	130	4.8	624,000	20,800
Total			3,167,300	105,577
Net				

Emission Factors (lbs/MCuft)

CO	ROC	NOx	PM10	SOx
20	5.3	120	0.2	0
Emissions from Natural Gas Consumption (lbs/day)				
0.007	0.002	0.04	0	0
0.02	0.005	0.118	0	0
0.026	**0.007**	**0.158**	**0**	**0**
0.584	0.155	3.503	0.006	0
0.193	0.051	1.16	0.002	0
0.039	0.01	0.232	0	0
0.068	0.018	0.406	0.001	0
0.116	0.031	0.696	0.001	0
0.503	0.133	3.016	0.005	0
0.193	0.051	1.16	0.002	0
0.416	0.11	2.496	0.004	0
2.112	0.56	12.669	0.021	0
2.086	**0.553**	**12.511**	**0.021**	**0**

West Bluffs
Regional Emission Calcs

Speeds - LA County Average		Trip Length		Percent Trips	
AM-Peak	CO, NOx	Work		Work	
1987	24	1987	9.6	1987	38.76%
2010	21	2010	10.8	2010	38.88%
1998	22.6	1998	10.17	1998	38.82%
Off-Peak	ROC	Non-work		Non-work	
1987	34	1987	5.6	1987	61.24%
2010	33	2010	6.3	2010	61.12%
1998	33.5	1998	5.93	1998	61.18%
PM-Peak	SOX, PM10, Pb				
1987	18				
2010	15				
1998	16.6				

Temperature (degrees F)

	LA Coastal	Speed (mph)
CO	60	22.6
Nox	75	22.6
ROC	85	33.5

	Year 1998	Trips	Trip Length Work	Trip Length Non-work	Percent of Trips Work	Percent of Trips Non-work	Number of Vehicles	VMT
Existing								
Office		528	10.17	5.93	0.39	0.61	264	4,000
Multi-Plex		1,374	10.17	5.93	0.39	0.61	687	10,409
		1,902					951	14,409
Project								
Retail		9,025	10.17	5.93	39%	61%	4,513	68,372
Restaurant		5,405	10.17	5.93	39%	61%	2,703	40,948
Broadcast Studio		62	10.17	5.93	39%	61%	31	470
Ballroom		928	10.17	5.93	39%	61%	464	7,030
Live Entertainment		2,736	10.17	5.93	39%	61%	1,368	20,728
Live Theatre		2,042	10.17	5.93	39%	61%	1,021	15,470
Multi-Plex		2,337	10.17	5.93	39%	61%	1,169	17,705
Hotel		967	10.17	5.93	39%	61%	484	7,326
Total		23,502					11,751	178,049

Emission Factors - 1998

	CO (gm/mile)	ROG (gm/mile)	Diurnal (gm/veh)	Resting (gm/veh)	Soak (gm/trp)	Nox (gm/mile)	PM10 (gm/mile)
Existing							
Office	21.57	0.95	0.55	0.80	1.19	1.51	0.07
Multi-Plex	21.57	0.95	0.55	0.80	1.19	1.51	0.07
Project							
Retail	21.57	0.95	0.55	0.80	1.19	1.51	0.07
Restaurant	21.57	0.95	0.55	0.80	1.19	1.51	0.07
Broadcast Studio	21.57	0.95	0.55	0.80	1.19	1.51	0.07
Ballroom	21.57	0.95	0.55	0.80	1.19	1.51	0.07
Live Entertainment	21.57	0.95	0.55	0.80	1.19	1.51	0.07
Live Theatre	21.57	0.95	0.55	0.80	1.19	1.51	0.07
Multi-Plex	21.57	0.95	0.55	0.80	1.19	1.51	0.07
Hotel	21.57	0.95	0.55	0.80	1.19	1.51	0.07

Emissions (lbs/day)

	CO	ROG Running	ROG Diurnal	ROG Resting	ROG Soak	NOx	PM10
Existing							
Office	190	8	0	0	1	13	1
Multi-Plex	495	22	1	1	4	35	2
Project							
Retail	3248	143	5	8	24	227	11
Restaurant	1945	86	3	5	14	136	6
Broadcast Studio	22	1	0	0	0	2	0
Ballroom	334	15	1	1	2	23	1
Live Entertainment	985	43	2	2	7	69	3
Live Theatre	735	32	1	2	5	51	2
Multi-Plex	841	37	1	2	6	59	3
Hotel	348	15	1	1	3	24	1

	CO	ROG	NOx	PM10	SOx
Existing					
Mobile	685.000	37.000	48.000	3.000	
Stationary	0.329	0.022	1.899	0.061	0.182
Project					
Mobile	8,458.000	468.000	591.000	27.000	
Stationary	10.483	0.979	60.802	1.695	5.023
Net Project					
Net-Mobile	7,773	431	543	24	-
Net-Stationary	10	1	59	2	5
Total Net-Project	7,783	432	602	26	5
SCAQMD Standard	550	55	55	150	150
Difference	7,233	377	547	(124)	(145)
Significant?	YES	YES	YES	NO	NO

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